

Janine Jasso
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El Paso, TX 79937
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Plaintiff, IN PRO PER

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

In Re: JAMIE LYNN GALLIAN

CASE NO. 8:21-bk-11710-SC

Chapter 7

Adversary No. 8:21-ap-01096-SC

JANINE JASSO, an individual,
Plaintiff,

v.

JAMIE LYNN GALLIAN, an individual; J-
PAD, LLC, a California Limited Liability
Company, J-Sandcastle Co LLC, a
California Limited Liability Company, and
DOES 1 through 100, inclusive,

Defendants.

**DECLARATION OF JANINE JASSO IN
SUPPORT OF MOTION AND MOTION
FOR ENTRY OF DEFAULT JUDGMENTS
AGAINST DEFENDANTS J-PAD, LLC
AND J-SANDCASTLE CO LLC AND
PLAINTIFF'S BRIEF IN SUPPORT
THEREOF**

[Notice of Motion and Motion for Entry Of Default
Judgments; Plaintiff's Brief In Support Of Motion for
Default Judgments of Defendants J-PAD LLC and J-
SANDCASTLE CO LLC Filed Concurrently
Herewith]

Hearing: January 11, 2022
Time: 11 a.m.
Courtroom: 5C-Virtual.

I, JANINE JASSO, declare as follows:

1. I am an individual, over the age of eighteen and the Plaintiff in the above-entitled

1 action. At all relevant times, I have been a Board member of The Huntington Beach Gables
2 Homeowners Association (“HOA” or “Association”). I have personal knowledge of the facts
3 stated herein and except as to those matters stated upon information and belief, I believe them to
4 be true. I could and would testify to said facts if sworn as a witness in this proceeding.

5 2. I make this declaration (“Declaration”) in support of my Motion for Entry of
6 Default Judgments of Defendant J-PAD, LLC (“JP LLC”) and Defendant J-SANDCASTLE CO
7 LLC (“JSC LLC”) (collectively “Defendant LLCs”) (“Motion”) filed concurrently herewith.
8

9 3. Plaintiff timely filed a First Amended Complaint

10 4. Capitalized terms not defined in this Declaration have the meaning ascribed to
11 them in the Motion.

12 5. I was injured by the Defendant LLCs which Debtor used to do ongoing
13 fraudulent transfers in order to hinder, delay and/or defraud me from collecting the civil
14 judgment ordered since 2018, FAC DK 6 Exhibit 4, in the amount of approximately \$67,550.65
15 (the civil judgment plus interest), which is the original judgment debt, plus interest. The criminal
16 restitution judgment was ordered non-dischargeable pursuant to Plaintiff FAC’s First Cause of
17 Action on December 19, 2022. [DK 85]. The criminal restitution judgment debt is
18 approximately \$14,630 (the criminal restitution judgment plus interest), FAC DK 6 Exhibit 3, is
19 incorporated by reference in the FAC’s Claims 2-5. The judgments are included in this Motion
20 to request the Court to add the Defendant LLCs as additional judgment debtors to these
21 judgments.
22

23 6. I have communicated with the Trustee’s legal counsel regarding this Motion to
24 explain that it is not my intention to obtain bankruptcy estate assets with this Motion, but only to
25 ensure that I am able to collect against any post-petition assets held by the Defendant LLCs that
26 are unrelated to bankruptcy estate assets or are abandoned bankruptcy estate assets by the
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1 Trustee. I have also agreed to continue communication with the Trustee's counsel to ensure that
2 any of my future collection efforts abide by the bankruptcy rules.

3 7. I declare that Paragraphs 1-204 of Plaintiff's Brief In Support of Motion for
4 Default Judgments of Defendants J-PAD LLC and J-SANDCASTLE CO LLC are incorporated
5 here by reference as if each paragraph has been declared individually here. The paragraphs
6 incorporated herein are a chronology of the facts related to my Motion.

7 **Please take judicial notice of the following exhibits related to my Brief in support my**
8 **Motion for Entry of the Defendant LLCs Default Judgments:**
9

10 8. Plaintiff's First Amended Complaint Docket 6.

11 9. Defendant Jamie Lynn Gallian's ("Defendant" or "Debtor") Answer to the First
12 Amended Complaint Docket 13.

13 10. Debtor's Form F 1007-4, Corporate Ownership Statement Pursuant to FRBP
14 1007(a)(1) and 7007.1, and LBR 1007-4 Docket 29.

15 11. A true and correct copy of Notice of Motion and Motion Objecting to Debtor's
16 Claimed Homestead Exemption; Memorandum of Points and Authorities; Declaration of D.
17 Edward Hays in Support filed by Houser Bros Co., Chapter 7 main Bankruptcy Case No. 8:21-
18 bk-11710-SC attached as **Exhibit 1**.

19 12. A true and correct copy of the Orange County Parcel Map for Tract 10542
20 attached as **Exhibit 2**.

21 13. A true and correct copy of the Court Transcript of the July 20, 2017 Elder
22 Abuse Restraining Order Hearing on the merits for *Sandra Bradley v. Jamie Gallian*, OCSC
23 Case No. 2017-00924559 which was granted, attached as **Exhibit 3**.

24 14. A true and correct copy of the state court's Minute Order dated November 8,
25 2018 quashing Debtor's Service of the Summons and Cross-Complaint of Cross-Complainant
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1 Jamie L. Gallian by Cross-Defendants LPL Management Corp., Asset Management Group,
2 and Hugh M Saddington, ordered in Case No. 30-2017-00913985, *The Huntington Beach*
3 *Gables HOA v. Bradley, Gallian, et al.*, which were the owners of the landlord/lessor, BS
4 Investors, of all 80 condominiums subleases in the HOA attached as **Exhibit 4**.

5 15. A true and correct copy of Defendants' Revised Trial Brief filed May 3, 2002 in
6 *Houser Bros Co., BS Investors, LLC v. Lasser, et. al.*, OCSC Case No. 00CC09649 attached as
7 **Exhibit 5**.

8 16. A true and correct copy of the Declaration of Kevin Jannak, Alternative Dispute
9 Resolution exhibit 41 for the case of Randall Nickel v. The Huntington Beach Gables
10 Homeowner's Association attached as **Exhibit 6**.

11 17. A true and correct copy of the state court's Order for Preliminary Injunction
12 filed January 11, 2018, Case No. 30-2017-00913985, *The Huntington Beach Gables HOA v.*
13 *Bradley, Gallian, et al.* attached as **Exhibit 7**.

14 18. A true and correct copy of the state court's Minute Order Dated September 7,
15 2018, Case No. 30-2017-00913985, *The Huntington Beach Gables HOA v. Bradley, Gallian,*
16 *et al.* attached as **Exhibit 8**.

17 19. A true and correct copy of the state court's Minute Order Dated September 27,
18 2018, Case No. 30-2017-00913985, *The Huntington Beach Gables HOA v. Bradley, Gallian,*
19 *et al.* attached as **Exhibit 9**.

20 20. A true and correct copy of the state court's Abstract of Judgment entered for
21 Debtor's unpaid discovery sanctions under Exhibit 9, above, attached as **Exhibit 10**.

22 21. A true and correct copy of David Flyer's Letter dated August 27, 2018 attached
23 as **Exhibit 11**.

24 22. A true and correct copy of the opinion of the California Appellate Court 4th
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1 District, Division 3, *Gallian v. Gragnano, et al.*, Case No. G057198 (unpublished), dated
2 September 15, 2020 attached as **Exhibit 12**.

3 23. A true and correct copy of the HOA Open Board Minutes Dated December 9,
4 2017 approving the HOA borrowing of reserve funds to pay legal expense to bring the 4476
5 Alderport condo into compliance with the governing documents, HOA Open Board Minutes
6 Dated August 13, 2018 approving the lien for Debtor's outstanding delinquent assessments,
7 Notice of Delinquent Assessments approved on August 13, 2018 attached as **Exhibit 13**.

8 24. A true and correct copy of the HOA Litigation Disclosure Letters Dated June 7,
9 2017, July 2, 2018, August 29, 2018, and February 27, 2019 attached as **Exhibit 14**.

10 25. A true and correct copy of the Debtor's email to the HOA Management dated
11 November 1, 2018 attaching emails from Ms. Shoats and Ms. Kapsal attached as **Exhibit 15**.

12 26. A true and correct copy of the Randall Nickel Deposition dated March 16, 2021
13 attached as **Exhibit 16**.

14 27. A true and correct copy of Mr. Nickel's Second Verified Amended Complaint,
15 *Nickel v. The Huntington Beach Gables HOA, et. al.*, OCSC Case No 30-20-01163055, dated
16 July 26, 2021 attached as **Exhibit 17**.

17 28. A true and correct copy of the Orange County, CA Recorder's Office List of
18 Properties of Randall Lee Nickel, Grant Deed Condo Unit 56 in San Bernardino, CA in an hoa
19 that R Nickel purchased in 2016, Grant Deed of real property in San Bernardino, CA that R
20 Nickel sold in 2008 attached as **Exhibit 18**.

21 29. A true and correct copy of Debtor's updated copy of Old Republic Preliminary
22 Title Report dated October 16, 2018, and certified copy on 11.10.22 of TD Bank Abstract of
23 Judgment originally recorded on March 9, 2017 attached as **Exhibit 19**.

24 30. A true and correct copy of November 1, 2018 Court Transcript regarding the
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1 Plaintiff's motion for attorney's fees attached as **Exhibit 20A**.

2 31. A true and correct copy of the HOA Attorney Pejman Kharrazian Email to Mr.
3 Nickel dated November 5, 2018 with attachments attached as **Exhibit 20B**.

4 32. A true and correct copy of the unrecorded Nickel-JP LLC Assignment of the
5 Sublease dated October 30, 2018 and Nickel's Two Cashiers Checks payable to Debtor dated
6 October 31, 2018 faxed by Mr. Nickel on November 7, 2018 to HOA attorney, Pejman
7 Kharrazian, as his claimed proof of purchase attached as **Exhibit 21**.

8 33. A true and correct copy of Debtor's Appellant's Opening Brief dated June 22,
9 2020 filed in Debtor's appellate case appealing the state court's terminating sanctions order
10 attached as **Exhibit 22**.

11 34. A true and correct copy of Jasso-Nickel Emails dated March 20, 2019, sent via
12 the HOA administrative manager, Linn Joslyn, after court ordered terminating sanctions in
13 favor of the HOA attached as **Exhibit 23**.

14 35. A true and correct copy of the Recorded First Amendment to the 4476
15 Alderport condo unit 53 sublease attached as **Exhibit 24**.

16 36. A true and correct copy of the Debtor's Alliant Credit Union Statement dated
17 October 31, 2018 attached as **Exhibit 25**.

18 37. A true and correct copy of the Debtor's Bank of America Personal Account
19 ending in #9338 dated November 16, 2018 attached as **Exhibit 26**.

20 38. A true and correct copy of the Application and Order for Appearance and
21 Examination dated March 4, 2021, against Debtor in the civil case listed in number 17, supra,
22 attached hereto as **Exhibit 27**.

23 39. A true and correct copy of the Docket for Debtor's Appeal, Case No. 30-2019-
24 01119765, *People v. Gallian*, criminal convictions, and Docket for Debtor's Appeal, Case No.
25

30-21-01189657, *People v. Gallian*, criminal restitution order and judgment, attached as

Exhibit 28.

40. A true and correct copy of the Bank Levy against Debtor's bank dated June 28, 2019 and executed by the Sherriff on October 11, 2019 attached as **Exhibit 29.**

41. A true and correct copy of the Well Fargo Bank Response Dated March 31, 2022 for Nickel's Wells Fargo Bank cashier's check payable to Debtor dated October 31, 2018 attached as **Exhibit 30.**

42. A true and correct copy of the Debtor's Chase Signature Card for Personal Accts ending in #7891 and #0186; Chase PCS Acct #7891 Nov-Dec 2018 Statements; Chase PCC Acct #0186 Nov. 2018 Statement attached as **Exhibit 31.**

43. A true and correct copy of the Chart 32 I created of Debtor's November 3, 2018 Fifteen Cashier's Checks from the subpoenaed Chase bank records for Debtor and Defendant LLCs attached as **Exhibit 32.**

44. A true and correct copy of the Defendant JSC LLC Chase Acct #7860 Signature Card and Chase Acct #7860 November 2018 Statement attached as **Exhibit 33.**

45. A true and correct copy of the Chart 34 I created of Defendant JSC LLC's November 16, 2018 One Cashier's Check and 16 of 17 Defendant JSC LLC Chase #7860 November 8, 2018 Cashier's Checks attached as **Exhibit 34.**

46. A true and correct copy of the 341a Hearing Meeting of Creditor's Transcript dated October 14, 2021 attached as **Exhibit 35.**

47. A true and correct copy of the Chart 36 I created of Defendant JSC LLC's Chase Acct #7860 November 16, 2018 Four Cashier's Check Payable to Lisa Ryan totaling \$170,000; Debtor's JSC LLC's Chase Acct #7860 withdrawal of \$170,000 and copies of these four cashier's checks attached as **Exhibit 36.**

1 48. A true and correct copy of the Defendant JSC LLC's Chase Acct #7860
2 November 8, 2018 One Cashier's Check Payable to Jamie Gallian in the amount of \$5,000,
3 endorsed by Debtor and cashed at Chase bank on November 13, 2018 attached hereto as
4 **Exhibit 37.**

5 49. A true and correct copy of the Defendant JSC LLC's Chase Acct #7860
6 November 8, 2018 One Cashier's Check Payable to Jamie Gallian in the amount of \$10,000,
7 endorsed by Debtor and cashed at Chase bank on November 26, 2018 attached hereto as
8 **Exhibit 38.**

9 50. A true and correct copy of the Chart 39 I created of Defendant PCC Chase Acct
10 #0186 November 3, 2018 and November 17, 2018 Nine Cashier's Check Payable to Jamie
11 Gallian totaling \$88,743 attached as **Exhibit 39.**

12 51. A true and correct copy of the Defendant JSC LLC Chase Acct #7860 Chase
13 Acct #7860 December 2018 Statement attached as **Exhibit 40.**

14 52. A true and correct copy of the Debtor's PCC Chase #0186 December 2018
15 Statement with deposit of \$20,000 cashier's check payable to Lisa Ryan endorsed by Debtor
16 attached as **Exhibit 41.**

17 53. A true and correct copy of the Defendant JSC LLC Chase Acct #7860 April
18 2019 Statement attached as **Exhibit 42.**

19 54. A true and correct copy of the Defendant JSC LLC Chase Acct #7860 May
20 2019 Statement attached as **Exhibit 43.**

21 55. A true and correct copy of the Debtor's subpoenaed Fidelity IRA account
22 statements May 2019-September 2019 Statements attached as **Exhibit 44.**

23 56. A true and correct copy of the Defendant JSC LLC Chase Acct #7860 June
24 2019 Statement attached as **Exhibit 45.**

1 57. A true and correct copy of the Defendant JSC LLC Chase Acct #7860 July
2 2019 Statement attached as **Exhibit 46**.

3 58. A true and correct copy of the Defendant JSC LLC Chase Acct #7860 August
4 2019 Statement attached as **Exhibit 47**.

5 59. A true and correct copy of the Defendant JSC Chase Acct #7860 September
6 2019 Statement attached as **Exhibit 48**.

7 60. A true and correct copy of the Defendant JSC LLC Chase Acct #7860 October
8 2019 Statement attached as **Exhibit 49**.

9 61. A true and correct copy of the Defendant JSC LLC Chase Acct #7860
10 November 2019 Statement attached as **Exhibit 50**.

11 62. A true and correct copy of the Defendant JSC LLC Chase Acct #7860
12 December 2019 Statement attached as **Exhibit 51**.

13 63. A true and correct copy of the Defendant JSC LLC Chase Acct #7860 January
14 2020 Statement attached as **Exhibit 52**.

15 64. A true and correct copy of the Defendant JSC LLC Chase Acct #7860 February
16 2020 Statement attached as **Exhibit 53**.

17 65. A true and correct copy of the Defendant JSC LLC Chase Acct #7860 March
18 2020 Statement attached as **Exhibit 54**.

19 66. A true and correct copy of the Defendant JSC LLC Chase Acct #7860 May and
20 June 2020 Statements attached as **Exhibit 56**.

21 67. A true and correct copy of the Defendant JSC LLC Chase Acct #7860 July
22 2020 Statement and Fidelity United Airlines 401k Plan processing of distribution July 23,
23 2020 attached as **Exhibit 56**.

24 68. A true and correct copy of the Defendant JSC LLC Chase Acct #7860
25
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28

September 2020 Statement attached as **Exhibit 57**.

69. A true and correct copy of the Defendant JSC LLC Chase Acct #7860

December 2020 Statement attached as **Exhibit 58**.

70. A true and correct copy of the Defendant JSC LLC Chase Acct #7860 January
2021 Statement attached as **Exhibit 59**.

71. A true and correct copy of the Defendant JSC LLC Chase Acct #7860 February
2021 Statement through August 2021 Statement attached as **Exhibit 60**.

72. A true and correct copy of the Defendant JP LLC BofA Acct #1274 deposit
with Defendant JSC LLC Chase Acct #7860 August 16, 2019 cashier's check as **Exhibit 61**.

73. A true and correct copy of the Defendant JP LLC BofA Acct #1274 Signature
Card and BofA Acct #1274 August 2019 Statement attached as **Exhibit 62**.

74. A true and correct copy of the Defendant JP LLC BofA Acct #1274 September
2019 Statement and Debtor's personal Alliant Credit Union September 2019 statement
attached as **Exhibit 63**.

75. A true and correct copy of the Defendant JP LLC BofA Acct #1274 November
2019 Statement attached as **Exhibit 64**.

76. A true and correct copy of the Defendant JP LLC BofA Acct #1274 December
2019 Statement attached as **Exhibit 65**.

77. A true and correct copy of the Defendant JP LLC BofA Acct #1274 January
2020 Statement and copies of two personal bail payments of \$5,000 and \$7,500, respectively,
attached as **Exhibit 66**.

78. A true and correct copy of the Defendant JP LLC BofA Acct #1274 March,
2021, July 2021 and November 2021 Statements attached as **Exhibit 67**.

79. A true and correct copy of the Debtor's personal Fidelity IRA rollover account

1 July-September 2021 statement attached as **Exhibit 68**.

2 80. A true and correct copy of Plaintiff's UCC judgment lien filed with the
3 California's Secretary of State against Debtor on July 23, 2020 attached as **Exhibit 69**.

4 81. A true and correct certified copy of Debtor Jamie Lynn Gallian's Deposition in
5 the main bankruptcy case no. 8:21-bk-11710-SC dated June 23, 2021 attached here to as
6 **Exhibit 70**.

7
8 82. A true and correct certified copy of Debtor Jamie Lynn Gallina's Deposition in
9 the Nickel v. The Huntington Beach Gables HOA, OCSC Case No. 30-20-01163055 dated
10 April 20, 2021 attached hereto as **Exhibit 71**.

11 83. A true and correct copy of the 341a Hearing Meeting of Creditor's Transcript
12 dated August 18, 2021 attached as **Exhibit 72**.

13 84. Therefore, I assert that my first claim for relief under my Adversary Case is a
14 non-dischargeable criminal restitution order.

15 85. Based on the Motion and my declaration and exhibits, I respectfully request that
16 the Court order default judgments of Defendant JP LLC and Defendant JSC LLC in my favor
17 on my First Amended Complaint's Second-Fifth Causes of Action, find Defendant LLCs are
18 the alter-egos of Debtor and add them as named judgment debtors to my civil and criminal
19 judgments, permission to continue with collection of these debts in state court regarding non-
20 bankruptcy estate assets and any other relief the Court determines.

21
22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct.

24
25 Executed on December 28, 2022, at El Paso, Texas.

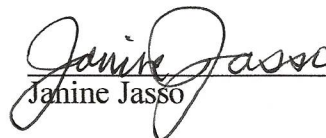
26
27 
28 Janine Jasso

EXHIBIT 1

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Attorneys for Movant and Creditor,
HOUSER BROS. CO. dba RANCHO DEL
REY MOBILE HOME ESTATES

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

In re

JAMIE LYNN GALLIAN,

Debtor.

Case No. 8:21-bk-11710-ES

Chapter 7

NOTICE OF MOTION AND MOTION
OBJECTING TO DEBTOR’S CLAIMED
HOMESTEAD EXEMPTION;
MEMORANDUM OF POINTS AND
AUTHORITIES; DECLARATION OF
D. EDWARD HAYS IN SUPPORT

Date: June 2, 2022

Time: 10:30 a.m.

Ctrm: 5A¹

Location: 411 W. Fourth Street, Santa Ana, CA
92701

TO THE HONORABLE ERITHE A. SMITH, UNITED STATES BANKRUPTCY JUDGE, THE
DEBTOR, AND ALL INTERESTED PARTIES:

PLEASE TAKE NOTICE that on June 2, 2022, at 10:30 a.m., in Courtroom 5A, of the
United States Bankruptcy Court, the Motion objecting to Debtor’s claimed homestead exemption
(“Motion”), filed by Houser Bros. Co., dba Rancho Del Rey Mobile Home Estates (“Houser Bros.”)

¹ To continue to aid in the mitigation of the spread of the COVID-19 virus and in light of the response of the Bar to continue virtual appearances, Judge Smith will continue to hold the majority of her hearings remotely using ZoomGov audio and video. However, beginning September 1, 2021, Judge Smith will allow the option for in-person hearings and/or hybrid proceedings for trial and evidentiary hearings only.

1 will be heard. The Motion is based upon this notice of motion, the Motion, and memorandum of
2 points and authorities in support thereof, the Declaration of D. Edward Hays, the pleadings and files
3 in the Debtor's bankruptcy case, and upon such further oral and documentary evidence as may be
4 presented to the Court in support of the Motion.

5 PLEASE TAKE FURTHER NOTICE that any response to the Motion must be in the form as
6 required by Local Bankruptcy Rule 9013-1(f) and filed with the Clerk of the above-entitled Court no
7 later than 14 days prior to the hearing date set forth above, and a copy served on Marshack Hays
8 LLP to the attention of D. Edward Hays, Laila Masud, and Bradford N. Barnhardt at the address
9 indicated above. A copy of any response must also be served on the Office of the United States
10 Trustee, 411 W. Fourth Street, Suite 7160, Santa Ana, CA 92701.

11
12 DATED: May 12, 2022

MARSHACK HAYS LLP

/s/ D. Edward Hays

By: _____

D. EDWARD HAYS

LAILA MASUD

BRADFORD N. BARNHARDT

Attorneys for Movant and Creditor,

HOUSER BROS. CO. dba RANCHO DEL

REY MOBILE HOME ESTATES

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6	2008 Bankr.LEXIS 5174, at *11 (Bankr. D. Nev. Jan. 10, 2008)	16
7	<i>In re Reade,</i>	
8	2014 Bankr.LEXIS 1391, at *10 (Bankr. C.D. Cal. Mar. 28, 2014)	10
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10	584 B.R. 325, 328 (Bankr. S.D. Cal. 2018)	9, 10, 12
11	<i>In re Tallerico,</i>	
12	532 B.R. 774, 780 (Bankr. E.D. Cal. 2015)	11, 12
13	<i>Kelley v. Locke (In re Kelley),</i>	
14	300 B.R. 11, 17, 20 (B.A.P. 9th Cir. 2003)	10
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OTHER AUTHORITIES

4 COLLIER ON BANKRUPTCY P 522.13[1] (2022)	15
4 COLLIER ON BANKRUPTCY P 522.13[1] (2022).	15

RULES

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Memorandum of Points and Authorities

1. Summary of Argument

A debtor may only exempt property that constitutes property of the estate.² Assets owned by an LLC are not assets of an LLC's member's bankruptcy estate. *Abraham & Sons Enters. v. Equilon Enters.*, 292 F.3d 958, 963 (9th Cir. 2002) ("Once members contribute assets to an LLC, those assets become capital of the LLC and the members lose any interest they had in the assets."). As a result, the Ninth Circuit Bankruptcy Appellate Panel has denied a claimed homestead exemption in a residence owned by an LLC in which the debtor was a member. *Schaefer v. Blizzard Energy, Inc. (In re Schaefer)*, 623 B.R. 777, 783 (B.A.P. 9th Cir. 2020). This is the exact situation presented by this case.

Specifically, Debtor resides in a manufactured home which she has claimed as exempt. But, Debtor did not acquire title to the manufactured home in her name. Instead, she readily admits that she transferred title to the manufactured home to an LLC in which she was a member. Because property of the estate includes only the LLC interest - and not the manufactured home owned by the LLC - Debtor's claim of exemption must be disallowed.

Further, there is purportedly a lien against the manufactured home held by one of Debtor's other LLCs which is subject to avoidance as fraudulent. Indeed, Debtor has a litigious history and a long line of creditors. Her actions in fraudulently transferring title to her manufactured home to one LLC and separately subjecting its value to phony liens held by another LLC prevent her from claiming a homestead exemption. To the extent the Trustee (1) recovers or brings the property into the estate by way of an avoidance action or by dissolving the LLC and distributing the assets to its member(s); or (2) avoids, recovers, and preserves such liens, the estate will obtain the benefit of the liens and Debtor will similarly be barred from claiming any exemption in such recovery under 11 U.S.C. § 522(g).

² 11 U.S.C. § 522(b) (providing that "an individual debtor may exempt *from property of the estate*...") (emphasis added); *see also Owen v. Owen*, 500 U.S. 305 (1991) ("Property that is properly exempted under § 522 is (with some exceptions) immunized against liability for prebankruptcy debts. § 522(c). No property can be exempted (and thereby immunized), however, unless it first falls *within* the bankruptcy estate.") (emphasis in original).

1 The benefits of bankruptcy including discharge and exemptions are for the honest, but
2 unfortunate debtor. Debtor must now suffer the consequences of her pre-bankruptcy conduct in
3 attempting to shelter her property from creditors. Because Debtor cannot meet her burden of proof to
4 establish a homestead, this court must decide whether to disallow it.

5 **2. Factual Background**

6 **A. Procedural Background**

7 On July 9, 2021 (“Petition Date”), Jamie Lynn Gallian (“Debtor”) filed a voluntary petition
8 under Chapter 7 of Title 11 of the United States Code. On the same date, Ms. Gallian filed her initial
9 Schedules and Statements (“Original Schedules”). A true and correct copy of the Original Schedules
10 is attached to the Declaration of D. Edward Hays (“Hays Declaration”) as **Exhibit 2**.

11 As set forth below, on the Petition Date, the registered title owner of the manufactured home
12 located at 16222 Monterey Lane, Space #376, Huntington Beach, CA 92649 (“Property”) was J-
13 Sandcastle Co, LLC (“J-Sandcastle LLC”) subject to liens purportedly held by the legal owners, J-
14 Pad, LLC and Ron Pierpont (“Mr. Pierpont”). Debtor’s Schedules further reflect that she was the
15 100% owner of J-Sandcastle LLC. Because the LLC (and not Debtor) was the owner of the
16 manufactured home on the Petition Date, the Property was not property of the Estate, and Debtor is
17 not entitled to a homestead exemption.

18 **i. Debtor’s Schedules**

19 Since filing her Original Schedules on the Petition Date, Debtor has filed nine additional sets
20 of amended schedules. The various Schedules present an ever-evolving and inconsistent picture of
21 the ownership of the Property on the Petition Date, as well as Debtor’s interest in J-Sandcastle LLC
22 (the owner of the home) and J-Pad, LLC (the purported secured creditor). Debtor’s Original
23 Schedules, filed on the Petition Date, provided as follows: “Registered Title with HCD³ Debtor’s
24 single member LLC, J-Sandcastle Co, LLC.” Debtor further scheduled a 100% interest in J-
25 Sandcastle LLC, noting that its “Purpose is to hold Registered title with HCD, to Debtor’s primary
26

27 ³ HCD is the Department of Housing and Community Development which issues certificates of title for
28 manufactured homes.

1 residence.” And, Debtor scheduled a 33.33% interest in J-Pad, LLC, noting that its “only purpose is
2 to hold a note and UCC-1 filing on Debtor’s primary residence.”

3 Since filing the Original Schedules, Debtor has amended them multiple times to allege that
4 she was the registered owner of the Property on the Petition Date, with her interest perfected with the
5 California Department of Housing and Community Development (“HCD”) on February 25, 2021.
6 Debtor’s most recently filed Schedule C claims a \$600,000 exemption in the Property pursuant to
7 § 704.730 of the California Code of Civil Procedure (“CCP”). Attached as Exhibit “1” is a table
8 reflecting the information contained in Debtors’ multiple sets of amended schedules. Attached as
9 Exhibits “2” through “11”, are the Debtor’s Schedules, Dk. Nos. 1, 15, 16, 17, 22, 37, 38, 39, 42, 72,
10 and 75⁴.

11 On March 16, 2022, as Docket No. 77, Debtor filed a “Corporate Ownership Statement . . .”
12 indicating that on November 22, 2021, she filed with the California Secretary of State certificates of
13 cancellation for both J-Pad, LLC and J-Sandcastle LLC (which actions exercised control over estate
14 property without Court authorization).

15 **ii. Debtor’s Bank Statements and HCD Title Searches**

16 According to records of the California Department of Housing and Community Development
17 (“HCD”), on November 1, 2018, the Property was transferred to J-Sandcastle LLC as registered
18 owner, with a “Pending Reg Card” as of January 18, 2019 (“Jan. 18, 2019, Title Search”). A true and
19 correct copy of the Jan. 18, 2019, Title Search is attached to the Hays Declaration as **Exhibit 12**. The
20 Property was transferred to J-Sandcastle LLC from Lisa T. Ryan. A true and correct copy of a
21 release form dated November 1, 2018 (“Ryan Release Form”), is attached to the Hays Declaration as
22 **Exhibit 13**. A true and correct copy of an HCD “Notice of Sale or Transfer” from Lisa Ryan to J-
23 Sandcastle LLC on November 1, 2018 (“Notice of Sale”), is attached to the Hays Declaration as
24 **Exhibit 14**.⁵

25
26 ⁴ The Chart attached as Exhibit 1, reflects the various differences between the Original Schedules on the
27 Petition Date and the amended Schedules.

28 ⁵ Debtor used her personal funds to purchase the Property but put title in the name of the J-Sandcastle LLC
which transfer was avoidable as an actual and constructive fraudulent transfer.

As of July 23, 2020, the Property's registered owner was J-Sandcastle LLC per a transfer on November 1, 2018, with "Last Title Date" and "Last Reg Card" as January 19, 2019 ("July 23, 2020, Title Search"). A true and correct copy of the July 23, 2020, Title Search is attached to the Hays Declaration as **Exhibit 15**.

On February 18, 2021, Debtor submitted an \$81 debit card payment to the HCD. A true and correct copy of Debtor's bank statements is attached to the Hays Declaration as **Exhibit 16**.

As of June 7, 2021, about a month before the Petition Date, the Property's registered owner remained J-Sandcastle LLC per a November 1, 2018, transfer, with "Last Title Date" and "Last Reg Card" as February 24, 2021 ("June 7, 2021, Title Search"). A true and correct copy of the June 7, 2021, Title Search is attached to the Hays Declaration as **Exhibit 17**. The Property's "Legal Owner[s]" were Pierpont and J-Pad LLC as tenants in common, with "Lien Perfected On: 08/20/20." *Id.*

On July 9, 2021, Debtor commenced this bankruptcy case. The evidence is clear that title on the Petition Date was J-Sandcastle and not Debtor.

On July 18, 2021, Debtor submitted a \$116 debit card payment to the HCD. Hays Declaration Ex. 16 at 137.

On July 20, 2021, Debtor submitted a \$25 debit card payment to the HCD. *Id.* at 137.

A week later, Debtor submitted three \$35 debit card payments to the HCD, and the next day, she submitted a \$35 debit card payment to the HCD. *Id.* at 136.

On August 5, 2021, Debtor submitted a \$35 debit card payment to the HCD. *Id.* at 135.

As of August 10, 2021, HCD records were changed to reflect that the Property's registered owner was "Jamie Lynn Gallian," with "Last Title Date" and "Last Reg Card" as August 10, 2021, per a "Sale/Transfer" of "Price \$.00 Transferred on 02/25/2021" ("Aug. 10, 2021, Title Search"). A true and correct copy of the Aug. 10, 2021, Title Search is attached to the Hays Declaration as **Exhibit 18**. No legal owners were listed, and the following "Record Conditions" were included: "An application for title or registration change is pending with the department." *Id.*

On August 11, 2021, Debtor submitted an \$81 debit card payment to the HCD. Hays Declaration Ex. 16 at 135.

As of September 21, 2021, the registered owner was Debtor, per a February 25, 2021, transfer for \$0, with “Last Title Date” and “Last Reg Card” as August 12, 2021 (“Sept. 21, 2021, Title Search”). A true and correct copy of the Sept. 21, 2021, Title Search is attached to the Hays Declaration as **Exhibit 19**. The “Legal Owner” was listed as J-Pad LLC, with “Lien Perfected On: 01/14/19.” *Id.* at 145.

iii. HCD Title Transactions

HCD records show a legal owner assignment regarding the Property with transaction date of February 1, 2021 (“February 2021 HCD Transaction”). A true and correct copy of the February 2021 HCD Transaction is attached to the Hays Declaration as **Exhibit 20**. The February 2021 HCD Transaction included an HCD certificate of title, which showed J-Sandcastle LLC as the Property’s registered owner, with title issued January 19, 2019. Hays Declaration Ex. 20 at 149. It also included a “Statement to Encumber” (*i.e.*, record a lien) in favor of Mr. Pierpont and J-Pad LLC. *Id.* at 157.

HCD records further show a registered owner transfer – “No Sale” – with transaction date of July 14, 2021 (“July 2021 HCD Transaction”). A true and correct copy of the July 2021 HCD Transaction is attached to the Hays Declaration as **Exhibit 21**. Attached to the July 2021 HCD Transaction is an HCD certificate of title, which showed J-Sandcastle LLC as the Property’s registered owner and Pierpont and J-Pad LLC as the Property’s legal owners, with title issued as of February 24, 2021. Hays Declaration Ex. 21 at 171. Debtor sought to add herself as the “New Registered Owner,” and provided a “Releasing Signature” of J-Sandcastle LLC, with February 25, 2021, as the “Date of Release.” *Id.* at 172. Debtor also included a “Lien Satisfied” document in which Mr. Pierpont certified that his and J-Pad LLC’s lien had been fully satisfied. *Id.* at 179. And, an attached County of Orange “Tax Clearance Certificate” executed and issued on July 9, 2021—the Petition Date—showed J-Sandcastle LLC as the “Current Registered Owner.” *Id.* at 191.

An HCD legal owner addition with a transaction date of August 10, 2021 (“August 2021 HCD Transaction”) included a certificate of title showing Debtor as the Property’s registered owner, with title issued August 3, 2021. A true and correct copy of the August 2021 HCD Transaction is

attached to the Hays Declaration as **Exhibit 22**. An attached “Statement to Encumber” sought to add J-Pad LLC as the Property’s legal owner. *Id.* at 201.

iv. Attempted Payments to Houser Bros.

Between February 1, 2021, and July 30, 2021, Debtor tried to make the following payments to Houser Bros. regarding the Property:

Date of Attempted Payment	Amount of Attempted Payment	Payor
February 1, 2021	\$1,086	J-Sandcastle LLC, Jamie Gallian
March 2, 2021	\$1,086	J-Sandcastle LLC, Jamie Gallian
April 9, 2021	\$1,086	J-Sandcastle LLC, Jamie Gallian
May 13, 2021	\$1,100	J-Sandcastle LLC, by Jamie Gallian, Member
June 4, 2021	\$1,100	J-Sandcastle LLC c/o QIP Management
July 1, 2021	\$1,100	J-Sandcastle LLC, by Jamie Gallian, Member
July 30, 2021	\$2,269.43	Jamie Gallian

True and correct copies of the returned payments are attached to the Hays Declaration as **Exhibit 23**. In other words, before the July 9, 2021, Petition Date, all payments that Debtor submitted to Houser Bros. listed J-Sandcastle LLC as the payor/were on behalf of J-Sandcastle LLC. Only *after* the Petition Date did Debtor submit a payment on her own behalf.

1 **3. Legal Argument**

2 **A. A debtor may only exempt property that is property of the estate.**

3 A debtor may only exempt property that constitutes property of the estate. 11 U.S.C. § 522(b)
4 (providing that “an individual debtor may exempt *from property of the estate*...”) (emphasis added);
5 *See also Owen v. Owen*, 500 U.S. 305 (1991) (“Property that is properly exempted under § 522 is
6 (with some exceptions) immunized against liability for prebankruptcy debts. § 522(c). No property
7 can be exempted (and thereby immunized), however, unless it first falls *within* the bankruptcy
8 estate.”) (emphasis in original).

9 Assets owned by an LLC are not assets of an LLC member’s bankruptcy estate. *Abraham &*
10 *Sons Enters. v. Equilon Enters.*, 292 F.3d 958, 963 (9th Cir. 2002) (“Once members contribute assets
11 to an LLC, those assets become capital of the LLC and the members lose any interest they had in the
12 assets.”). The Ninth Circuit Bankruptcy Appellate Panel has denied a claimed homestead exemption
13 in a residence owned by an LLC in which the debtor was a member. *Schaefer v. Blizzard Energy,*
14 *Inc. (In re Schaefer)*, 623 B.R. 777, 783 (B.A.P. 9th Cir. 2020). *See also, In re Farokhirad*, 8:21-
15 bk-10026-MW, ECF No. 98 (Bankr. C.D. Cal. Apr. 29, 2021) (sustaining chapter 7 trustee’s
16 objection to a debtor’s claimed homestead exemption under CCP § 704.730 where title to the
17 property was held by an LLC in which debtor was the sole member).

18 **B. Homestead Exemption**

19 California provides two alternative homestead exemptions: the declared homestead
20 exemption set forth in CCP §§ 704.910-704.995, and the automatic homestead exemption set forth in
21 CCP §§ 704.710-704.850. *In re Sain*, 584 B.R. 325, 328 (Bankr. S.D. Cal. 2018). Because declared
22 homesteads apply to voluntary sales, they generally do not arise in bankruptcy cases. *Id.*

23 In this case, Debtor’s most recent Schedule C claimed an exemption under the automatic
24 homestead exemption.⁶ Hays Decl. Ex. 10 at 103 (Eighth Amended Schedules, claiming a \$600,000
25 exemption in the Property pursuant to CCP § 704.730).

26
27 ⁶ In the Second Amended Schedules, Debtor asserts that that she recorded a “Homestead Declaration . . . with
28 OC Clerk Recorder 7/9/2021 @ 12:48 p.m.,” approximately 90 minutes before her petition was filed. Hays
Decl. Ex. 4 at 50. Further, on March 11, 2022, as Docket No. 74, Debtor filed a “Verification of Declaration
of Homestead filed with Orange County Clerk Recorder.”

Section 704.730(a) of the CCP provides:

(a) The amount of the homestead exemption is the greater of the following:

(1) The countywide median sale price for a single-family home in the calendar year prior to the calendar year in which the judgment debtor claims the exemption, not to exceed six hundred thousand dollars (\$600,000).

(2) Three hundred thousand dollars (\$300,000).

The automatic homestead exemption protects a debtor from a forced sale. Cal. Code Civ. P. § 704.720(a) (“A homestead is exempt from sale under this division” (Division 2 - Enforcement of Money Judgments)); *id.* § 704.740(a) (“a dwelling may not be sold under this division to enforce a money judgment except pursuant to a court order for sale obtained under this article” (Article 4 - Homestead Exemption)); *id.* § 704.740(b) (“If the dwelling is personal property... an exemption claim shall be made and determined as provided in Article 2 (Article 2 - Procedure for Claiming Exemptions)). The filing of a bankruptcy petition constitutes a forced sale. *Diaz v. Kosmala (In re Diaz)*, 547 B.R. 329, 334 (B.A.P. 9th Cir. 2016); *Kelley v. Locke (In re Kelley)*, 300 B.R. 11, 17, 20 (B.A.P. 9th Cir. 2003).

A debtor’s right to claim an exemption is determined as of the petition date. *In re Reade*, 2014 Bankr.LEXIS 1391, at *10 (Bankr. C.D. Cal. Mar. 28, 2014); *see also Harrington v. Ainsworth (In re Harrington)*, 2005 Bankr.LEXIS 3379, at *8 (B.A.P. 9th Cir. Aug. 22, 2005) (noting that the homestead exemptions set forth in CCP § 704.730(a) depend on whether the debtor is eligible for an exemption as of the petition date).

Debtor submitted the homestead declaration pursuant to § 704.930 of the CCP, meaning that it pertains to the declared homestead. *See Kelley v. Locke (In re Kelley)*, 300 B.R. 11, 17-18 (B.A.P. 9th Cir. 2003) (noting that the declared homestead exemption set forth in CCP §§ 704.910-704.995 requires recordation of a declaration of homestead). But, declared homesteads are not applicable to sales by a bankruptcy trustee. *See In re Sain*, 584 B.R. 325, 329 (Bankr. S.D. Cal. 2018) (indicating that only the automatic homestead was available to a debtor who held a recorded declaration of homestead, because the debtor had not elected a declared homestead exemption in his schedules, and declared homesteads are not applicable to sales by bankruptcy trustees); *see also In re Kelley*, 300 B.R. at 21 (noting that in the bankruptcy context, a debtor’s declaration of homestead “helps him not at all, as the additional benefits conferred in Article 5 [Sections 704.910-704.995] would benefit him only in the situation of a voluntary sale”) (emphasis in original).

1 California law defines a “homestead” as:
2 the principal dwelling (1) in which the judgment debtor or the judgment debtor’s
3 spouse resided on the date the judgment creditor’s lien attached to the dwelling, and
4 (2) in which the judgment debtor or the judgment debtor’s spouse resided
continuously thereafter until the date of the court determination that the dwelling is a
homestead.
5 Cal. Code Civ. P. § 704.710(c).

6 A “manufactured home together with the outbuildings and land upon which they are
7 situated” is eligible for a homestead exemption. Cal. Code Civ. Proc. § 704.710(a)(2) (defining
8 “dwelling”). An LLC interest, however, does not qualify for a homestead exemption. *Schaefers v.*
9 *Blizzard Energy, Inc. (In re Schaefers)*, 623 B.R. 777, 783 (B.A.P. 9th Cir. 2020) (indicating that
10 California’s residential exemption is inapplicable to interests in an LLC, which are personal property
11 interests outside the statutory definition of homestead under CCP § 704.710(c)).

12 Specifically, where title to a residential property is held by an LLC rather than a debtor
13 personally, the debtor cannot claim a homestead exemption in that property. *See In re Schaefers*, 623
14 B.R. at 783, 785 (holding that a debtor could not claim a homestead exemption in the property where
15 he resided because he admitted that the property was owned by an LLC); *In re Farokhirad*, 8:21-bk-
16 10026-MW, ECF No. 98 (Bankr. C.D. Cal. Apr. 29, 2021) (sustaining a chapter 7 trustee’s objection
17 to a debtor’s claimed homestead exemption under CCP § 704.730 where title to the property was
18 held by an LLC in which one of the debtors was the sole member). The rationale for these rulings is
19 that an LLC is a separate and distinct legal entity from its owners or members, and the LLC
20 members have no interest in the company’s assets. *In re Schaefers*, 623 B.R. at 783.

21 **C. Burden of Proof**

22 California, by statute, regulates the burden of proof regarding its exemptions. *In re Tallerico*,
23 532 B.R. 774, 780 (Bankr. E.D. Cal. 2015). CCP § 704.780(a)(1) provides:

24 The burden of proof at the hearing is determined in the following manner:

25 (1) If the records of the county tax assessor indicate that there is a current
26 homeowner’s exemption or disabled veteran’s exemption for the dwelling claimed by
27 the judgment debtor or the judgment debtor’s spouse, the judgment creditor has the
burden of proof that the dwelling is not a homestead. If the records of the county tax
28 assessor indicate that there is not a current homeowner’s exemption or disabled
veteran’s exemption for the dwelling claimed by the judgment debtor or the judgment

debtor's spouse, the burden of proof that the dwelling is a homestead is on the person who claims that the dwelling is a homestead.

California law allocates the burden of proof on a homestead based on the records of the county tax assessor. CCP § 704.780(a). *See also, In re Tallerico*, 532 B.R. 774, 780 (Bankr. E.D. Cal. 2015); *Diaz v. Kosmala (In re Diaz)*, 547 B.R. 329, 336-37 (B.A.P. 9th Cir. 2016) (holding that where a state law exemption statute specifically allocates the burden of proof to the debtor, Rule 4003(c) does not change that allocation) (citing *Raleigh v. Ill. Dep't of Revenue*, 530 U.S. 15 (2000)).

D. Because J-Sandcastle LLC was the Property's owner of record on the Petition Date, the Property did not become property of the estate subject to any exemption.

Here, Debtor bears the burden of proof to show entitlement to the homestead exemption because the Orange County Treasurer-Tax Collector records do not indicate that there is a "current homeowner's exemption or disabled veteran's exemption" for the Property.⁷ A true and correct copy of the 2021-22 tax bill for the Property is attached to the Hays Declaration as **Exhibit 24**, and, for reference, a true and correct copy of the tax bill for 16222 Monterey Lane, Space #375, Huntington Beach, CA 92649, which reflects a \$7,000 homeowner's exemption, is attached to the Hays Declaration as **Exhibit 25**. *See also McBeth v. Karr (In re Karr)*, 2006 Bankr.LEXIS 4801, at *15-17 n.3 (B.A.P. 9th Cir. Oct. 2, 2006) (noting that California law allocates the burden of proof on a homestead based on the records of the county tax assessor). Debtor cannot meet this burden because the HCD records show that J-Sandcastle LLC was the Property's owner of record on the Petition Date.

⁷ Although Debtor claims to have recorded a Homestead Declaration, she did so with the Orange County Clerk-Recorder, *not* the Orange County Treasurer-Tax Collector. Further, a declaration of homestead does not pertain to the automatic homestead exemption. *See In re Sain, supra*.

According to an HCD webpage, for a manufactured home or manufactured home titled with the HCD with a decal number that begins with the letter ‘L,’ such as the Property here,⁸ certain “documents and fees” must be submitted to the HCD to “transfer ownership.” A true and correct copy of the HCD webpage is attached to the Hays Declaration as **Exhibit 26**. Fees can be paid by card. A true and correct copy of the HCD webpage for submission of a payment is attached to the Hays Declaration as **Exhibit 27**. The HCD’s payment portal provides a way to submit payment for “any Codes and Standards transactions that require payment,” including “Manufactured home/manufactured home title transfers.” Hays Decl. Ex. 27 at 227.

Based on Debtor’s 2021 bank statements and the 2021 HCD title searches for the Property, there is a correlation between Debtor’s submission of payments to the HCD and changes to the Property’s title information:

Date	Significance of Date	Citation
2/18/2021	\$81 payment from Debtor to HCD	Bank Statements at 7
	Update to "Title Date" and "Reg Card" per HCD title records. J-Sandcastle LLC shown as registered owner, and Ronald Pierpont and Jpad LLC shown as	
2/24/2021	legal owners.	June 7, 2021 Title Search
7/9/2021	Petition Date	BK Docket #1
7/18/2021	\$116 payment from Debtor to HCD	Bank Statements at 21
7/20/2021	\$25 payment from Debtor to HCD	Bank Statements at 21
7/27/2021	Three \$35 payments from Debtor to HCD	Bank Statements at 20
7/28/2021	\$35 payment from Debtor to HCD	Bank Statements at 20
	Update to "Title Date" and "Reg Card" per HCD title records. Debtor shown as registered owner per a	
8/3/2021	transfer on February 25, 2021.	August 10, 2021 Title Search
8/5/2021	\$35 payment from Debtor to HCD	Bank Statements at 19
8/11/2021	\$81 payment from Debtor to HCD	Bank Statements at 19
	Update to "Title Date" and "Reg Card" per HCD title records. Debtor shown as registered owner per a	
	transfer on February 25, 2021. J-Pad LLC shown as	September 21, 2021 Title
8/12/2021	legal owner.	Search

As of June 7, 2021—about a month before the Petition Date—the Property’s registered owner was J-Sandcastle LLC, and the legal owners were Pierpont and J-Pad LLC. Hays Declaration

⁸ The Property has Decal No. LBM1081. *See, e.g.*, Hays Decl. Ex. 21 at 169 (Certificate of Title attached to the July 2021 HCD Transaction).

1 Ex. 17 at 142 (June 7, 2021, Title Search). The June 7, 2021, Title Search did not note any pending
2 applications for title or registration change that might have added Debtor as the registered or legal
3 owner of the Property before the Petition Date. *Compare* Hays Declaration Ex. 18 at 143 (Aug. 10,
4 2021, Title Search noting that an application for title or registration change was pending with the
5 HCD), *with* Hays Declaration Ex. 17 at 142 (June 7, 2021, Title Search which does not include any
6 such note).

7 And, Debtor paid no fees to the HCD between June 7, 2021, and the Petition Date that could
8 have effectuated a change in title. *See* Hays Decl.: Ex. 26 (HCD webpage, indicating that
9 “documents *and fees*” must be submitted to the HCD to transfer ownership of a manufactured home
10 or manufactured home) (emphasis added); Ex. 272 (HCD payment portal, indicating that
11 manufactured home/manufactured home title transfers require payment).

12 Further, the July 2021 HCD Transaction had a transaction date of July 14, 2021—five days
13 after the Petition Date—and included a certificate of title showing J-Sandcastle LLC as the
14 Property’s registered owner and Pierpont and J-Pad LLC as the Property’s legal owners. Hays
15 Declaration Ex. 21 at 171. Included in this post-petition transaction was a document to add Debtor as
16 the Property’s “*New Registered Owner*.” *Id.* at 172 (emphasis added). Also attached was a County of
17 Orange “Tax Clearance Certificate” issued and executed on the Petition Date, which gave the
18 Property’s “Current Registered Owner” as J-Sandcastle LLC. *Id.* at 191. The August 2021 HCD
19 Transaction did include a certificate of title showing Debtor as the Property’s registered owner, but
20 according to the certificate, title was issued on August 3, 2021, nearly a month after the Petition
21 Date. Hays Declaration Ex. 22 at 195. Indeed, Debtor’s attempted payments to Houser Bros.
22 regarding the Property were paid on behalf of J-Sandcastle LLC pre-petition, and only after the
23 Petition Date did Debtor try to submit a payment in her own name. *See* Hays Decl. Ex. 23 at 203-222
24 (returned payments that Debtor tried to make to Houser Bros.).

25 The evidence is thus clear – on the Petition Date, the Property’s registered owner was J-
26 Sandcastle LLC, and the legal owners were Pierpont and J-Pad, LLC. Until the post-petition
27 recordation with the HCD, any alleged transfer of title to Debtor personally was ineffective. *See In*
28 *re Farokhirad*, Case No. 8:21-bk-10026-MW, ECF No. 98 (Bankr. C.D. Cal. Apr. 29, 2021)

(sustaining a trustee's objection to an individual debtor's claimed homestead exemption in property held by a wholly owned LLC, and indicating that a provision of the LLC agreement purporting to transfer an interest in the property to the debtor prepetition was ineffective because an unrecorded deed could not bind the trustee). And, as indicated above, where title to a residence is held by an LLC rather than the debtor, the debtor cannot claim a homestead exemption in that property. *See Schaefer v. Blizzard Energy, Inc. (In re Schaefer)*, 623 B.R. 777, 783, 785 (B.A.P. 9th Cir. 2020) (holding that a debtor could not claim a homestead exemption in his residence because the property was held by an LLC); *In re Farokhirad*, 8:21-bk-10026-MW, ECF No. 98 (Bankr. C.D. Cal. Apr. 29, 2021) (sustaining a chapter 7 trustee's objection to a CCP § 704.730 homestead exemption where title to the property was held by an LLC in which one of the debtors was the sole member).

E. Alternatively, § 522(p) imposes a \$170,350 cap on any exemption Debtor can claim in the Property.

11 U.S.C. § 522(p) imposes a monetary limit of \$170,350 on the amount of a debtor's interest in homestead property that may be exempted to the extent that there has been an acquisition of a homestead interest within a period of 1,215 days before the commencement of the case.

4 COLLIER ON BANKRUPTCY P 522.13[1] (2022). It provides, in relevant part:

[A]s a result of electing under subsection (b)(3)(A) to exempt property under State or local law, a debtor may not exempt any amount of interest that was acquired by the debtor during the 1215-day period preceding the date of the filing of the petition that exceeds in the aggregate \$170,350 in value in—

(A) real or personal property that the debtor or a dependent of the debtor uses as a residence; . . . or

(D) real or personal property that the debtor or dependent of the debtor claims as a homestead.

11 U.S.C. § 522(p)(1).

Section 522(p) applies when a debtor seeks to exempt an interest in homestead property under § 522(b)(3)(A) by claiming exemptions under state law or local law. 4 COLLIER ON BANKRUPTCY P 522.13[1] (2022). "Section 522(p) applies in all cases regardless of whether a state has opted out of federal bankruptcy exemptions." *In re Narita*, 2008 Bankr.LEXIS 5174, at *11

(Bankr. D. Nev. Jan. 10, 2008) (citation omitted).⁹ California has opted out of the federal exemption scheme and provides its own bankruptcy exemptions. Cal. Code Civ. P. § 703.130; *Phillips v. Gilman* (*In re Gilman*), 887 F.3d 956, 964 (9th Cir. 2018).

To the extent this Court finds that, on the Petition Date, Debtor held title to the manufactured home and thus is eligible to claim an exemption, any such is capped at \$170,350 pursuant to Section 522(p). Debtor claims a \$600,000 homestead exemption in the Property pursuant to § 704.730 of the CCP. Hays Decl. Ex. 10 at 103. She further values the Property at \$235,000 in her schedules. *See, e.g.,* Hays Decl. Ex. 2 at 33 (Debtor’s Original Schedules, valuing the Property at \$235,000). Yet, J-Sandcastle LLC acquired the Property from Lisa Ryan on November 1, 2018, and Debtor acquired her interest in the Property in 2021. *See* Hays Decl., Ex. 12 at 115 (Jan. 18, 2019, Title Search, showing that the Property was transferred to J-Sandcastle LLC on November 1, 2018); Ex. 13 at 116-117 (Ryan Release Form, indicating that the Property was transferred to J-Sandcastle LLC from Lisa Ryan on November 1, 2018); Ex. 14 at 118-119 (Notice of Sale, same); Ex. 18 at 143 (August 10, 2021, Title Search, providing that the Property’s registered owner was “Jamie Lynn Gallian,” with “Last Title Date” and “Last Reg Card” as August 10, 2021). These dates are well within the 1,215-day period before the Petition Date, which is between March 12, 2018, and July 9, 2021. Therefore, any allowed exemption must be limited to \$170,350 pursuant to 11 U.S.C. § 522(p).

4. Conclusion

Assets owned by an LLC are not property of an individual member’s bankruptcy estate. As stated by the Supreme Court in *Owen*, “No property can be exempted (and thereby immunized), however, unless it first falls within the bankruptcy estate.” Debtor’s claimed exemption in the Property thus fails. In the alternative, any allowed exemption must be capped at \$170,350.

Movant thus respectfully requests that the Court enter an order:

- 1) Granting this Motion;

⁹ *Contra, In re McNabb*, 326 B.R. 785 (Bankr. D. Ariz. 2005).

- 1 2) Sustaining the objection to Debtor's claimed homestead exemption under CCP § 704.730,
2 and disallowing any claim of exemption by Debtor in the Property pursuant to CCP
3 § 704.730;
4 3) Alternatively, finding that any allowed exemption be capped at \$170,350 pursuant to 11
5 U.S.C. § 522(p); and
6 4) Awarding such other and further relief as the Court deems just and proper.

7
8 DATED: May 12, 2022

MARSHACK HAYS LLP

9 /s/ D. Edward Hays

10 By: _____

D. EDWARD HAYS

LAILA MASUD

11 BRADFORD N. BARNHARDT

12 Attorneys for Movant and Creditor,

HOUSER BROS. CO. dba RANCHO DEL

13 REY MOBILE HOME ESTATES
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Declaration of D. Edward Hays

I, D. EDWARD HAYS, say and declare as follows:

1. I am an individual over 18 years of age and competent to make this Declaration.
2. If called upon to do so, I could and would competently testify as to the facts set forth in this Declaration.
3. The facts set forth below are true of my personal knowledge.
4. I am an attorney at law duly admitted to practice before this Court and all courts of the State of California.
5. I am a partner in the law firm of Marshack Hays LLP, attorneys of record for Houser Bros. Co., dba Rancho Del Rey Mobile Home Estates ("Houser Bros.").
6. I make this Declaration in support of the "Notice of Motion and Motion Objecting to Debtor's Claimed Homestead Exemption" ("Motion").
7. Capitalized terms not defined in this Declaration have the meaning ascribed to them in the Motion.
8. A table reflecting the information contained in Debtors' multiple sets of amended schedules is attached as **Exhibit 1**.
9. A true and correct copy of Debtor's Original Schedules¹⁰ filed July 9, 2021, as Docket #1 is attached as **Exhibit 2**.
10. A true and correct copy of Debtor's First Amended Schedules filed September 7, 2021, as Docket #15 is attached as **Exhibit 3**.
11. A true and correct copy of Debtor's Second Amended Schedules filed September 22, 2021, as Docket #s 16-17 is attached as **Exhibit 4**.
12. A true and correct copy of Debtor's Third Amended Schedules filed October 14, 2021, as Docket #22 is attached as **Exhibit 5**.

¹⁰ For the sake of brevity, all schedules, other than Debtor's Eighth Amended Schedules, will include only Schedules A/B and D, as applicable. Debtor's Eighth Amended Schedules will also include Schedule C.

1 13. A true and correct copy of Debtor's Fourth Amended Schedules filed November
2 16, 2021, as Docket #37 is attached as **Exhibit 6**.

3 14. A true and correct copy of Debtor's Fifth Amended Schedules filed November 22,
4 2021, as Docket #38 is attached as **Exhibit 7**.

5 15. A true and correct copy of Debtor's Sixth Amended Schedules filed November
6 23, 2021, as Docket #39 is attached as **Exhibit 8**.

7 16. A true and correct copy of Debtor's Seventh Amended Schedules filed December
8 1, 2021, as Docket #42 is attached as **Exhibit 9**.

9 17. A true and correct copy of Debtor's Eighth Amended Schedules filed March 11,
10 2022, as Docket #72 is attached as **Exhibit 10**.

11 18. A true and correct copy of Debtor's Ninth Amended Schedules filed March 15,
12 2022, as Docket #75 is attached as **Exhibit 11**.

13 19. On November 10, 2021, I received from Chris Houser ("Mr. Houser") a
14 California Department of Housing and Community Development ("HCD") "Title Search"
15 printed January 18, 2019 ("Jan. 18, 2019, Title Search"). A true and correct copy of the Jan. 18,
16 2019, Title Search, provided to me, is attached as **Exhibit 12**.

17 20. A true and correct copy of the Ryan Release Form, provided to me, is attached as
18 **Exhibit 13**.

19 21. A true and correct copy of the Notice of Sale, provided to me, is attached as
20 **Exhibit 14**.

21 22. On November 10, 2021, I received from Mr. Houser an HCD "Title Search"
22 printed July 23, 2020 ("July 23, 2020, Title Search"). A true and correct copy of the July 23,
23 2020, Title Search, provided to me, is attached as **Exhibit 15**.

24 23. On or around October 20, 2021, I received an e-mail from the office of Chapter 7
25 Trustee Jeffrey Golden which contained copies of the Bank of America, N.A. statements of
26 Debtor regarding a debit card ending -7357 for the period starting December 13, 2020, through
27 October 12, 2021 ("Bank Statements"). A true and correct copy of the Bank Statements provided
28 to me is attached as **Exhibit 16**.

24. On November 10, 2021, I received from Mr. Houser an HCD “Title Search” printed June 7, 2021 (“June 7, 2021, Title Search”). A true and correct copy of the June 7, 2021, Title Search provided to me is attached as **Exhibit 17**.

25. On November 10, 2021, I received from Mr. Houser an HCD “Title Search” printed August 10, 2021 (“Aug. 10, 2021, Title Search”). A true and correct copy of the Aug. 10, 2021, Title Search provided to me is attached as **Exhibit 18**.

26. On November 10, 2021, I received from Mr. Houser an HCD “Title Search” printed September 21, 2021 (“Sept. 21, 2021, Title Search”). A true and correct copy of the Sept. 21, 2021, Title Search provided to me is attached as **Exhibit 19**.

27. A true and correct copy of the February 2021 HCD Transaction provided to me is attached as **Exhibit 20**.

28. A true and correct copy of the July 2021 HCD Transaction provided to me is attached as **Exhibit 21**.

29. A true and correct copy of the August 2021 HCD Transaction provided to me is attached as **Exhibit 22**.

30. I am informed and believe that between February 1, 2021, and July 30, 2021, Debtor/J-Sandcastle LLC attempted to make payments to Houser Bros. regarding the Property. True and correct copies of the returned payments from Debtor/J-Sandcastle LLC to Houser Bros. provided to me are attached as **Exhibit 23**.

31. A true and correct copy of the Orange County Treasurer-Tax Collector “2021-22 Secured Property Tax Bill” for 16222 Monterey Lane, Space #376, Huntington Beach, CA 92649 (the “Property”), available at <http://oct.estreamone.com/Show.aspx?parcel=891-569-62&year=2021>, as of May 2, 2022, is attached as **Exhibit 24**.

32. A true and correct copy of the Orange County Treasurer-Tax Collector “2021-22 Secured Property Tax Bill” for 16222 Monterey Lane, Space #375, Huntington Beach, CA 92649, available at <http://oct.estreamone.com/Show.aspx?parcel=891-563-75&year=2021>, as of May 2, 2022, is attached as **Exhibit 25**.

EXHIBIT 1

Schedules	Sch. A/B re: Property	Sch. A/B re: J- Sandcastle LLC	Sch. A/B re: J- Pad, LLC	Sch. D re: liens
Original Schedules, filed July 9, 2021, as Docket #1, Hays Decl. Ex. 2	Debtor scheduled a \$235,000 interest in the Property, noting: “Registered Title with HCD Debtor’s single member LLC, J- Sandcastle Co, LLC.”	Debtor scheduled a 100% interest in J-Sandcastle LLC. According to Debtor, “Purpose is to hold Registered title with HCD, to Debtor’s primary residence.”	Debtor scheduled a 33.33% interest in J-Pad, LLC, noting: “only purpose is to hold a note and UCC-1 filing on Debtor’s primary residence.”	Schedule D listed a \$175,000 secured claim of J-Pad, LLC and Pierpont against the Property perfected August 20, 2020.
First Amended Schedules, filed September 7, 2021, as Docket #15, Hays Decl. Ex. 3	Debtor scheduled a \$235,000 interest in the Property, indicating: “Registered Owner, Jamie Lynn Gallian with HCD perfected 2/25/2021.”	Debtor scheduled a 100% interest in J-Sandcastle LLC. According to Debtor: “Original purpose of LLC was to hold HCD Registration to	Debtor scheduled a 33.33% interest in J-Pad, LLC, with the following information: “Entity Assets include . . . Certificate of Title with HCD,	No amended schedule D was filed.

		Debtor's residence. HCD Registration was transferred to debtor on 2/25/2021."	perfected 1/14/2019, LBM 1081; 2014 Skyline Custom Villa Manufactured Home UCC-1 Manufactured Home Financing Statement perfected 1/14/2019, against personal property located at 16222 Monterey Lane, Space 376, Huntington Beach, CA 92649."	
Second Amended Schedules, filed September 22, 2021, as Docket #s 16-17, Hays	Debtor scheduled a \$235,000 interest in the Property, indicating: "HCD COT Registration	Debtor scheduled a 100% interest in J-Sandcastle LLC, indicating: "Debtor	Debtor scheduled a 1/7 interest in J-Pad, LLC, noting: "Only purpose is to hold HCD	Debtor's Schedule D included a \$175,000 secured claim of J-Pad, LLC;

Decl. Ex. 4	transferred 2/25/2021, from J- Sandcastle Co LLC Debtor's single member LLC, to Debtor Debtor Homestead Declaration filed with OC Clerk Recorder 7/9/2021 @ 12:48 p.m.”	Purchased home on 11/1/2018 HCD Registered to J- Sandcastle Co LLC. . . . J- Sandcastle Co LLC transferred Registration to Jamie Lynn Gallian, perfected with HCD 2/25/2021”	Certificate of Title, perfected 1/14/2019 of debtors primary residence”	Steven and Brian Gallian; EJ Gallian; Justin Barclay; Pierpont; Robert Pierpont; and Debtor, against the Property.
Third Amended Schedules, filed October 14, 2021, as Docket #22, Hays Decl. Ex. 5	Debtor scheduled a \$275,000 interest in the Property, indicating: “Title/Registration through HCD; LBM 1081 to Debtor.”	Debtor scheduled a 100% interest in J-Sandcastle LLC, adding: “Note payable in the approximate amount of \$225,000.00, dated 11/16/2018,	Debtor scheduled a 70% interest in J-Pad, LLC, indicating: “J-Pad, LLC holds COT perfected with HCD. Holder of UCC-1, perfected 1/14/2019, secured Note	Debtor's Schedule D included a \$225,000 secured claim of J-Pad, LLC, and Steven and Brian Gallian against the Property.

		secured by UCC-1, perfected 1/14/2019. . . .”	receivable \$225,000.00. . . .”	
Fourth Amended Schedules, filed November 16, 2021, as Docket #37, Hays Decl. Ex. 6	Debtor scheduled a \$235,000 interest in the Property.	Debtor scheduled a 100% interest in J-Sandcastle LLC, indicating: “Original purpose of LLC was to hold HCD Registration to Debtor’s residence. HCD Registration was transferred to debtor on 2/25/2021”	Debtor scheduled a 33- 1/3% interest in J-Pad, LLC, noting: “J-Pad, LLC Holder of COTA perfected 1/14/2019. UCC-1 AD filed 1/14/2019, 30- yr. Manufactured Home Transaction secured by LBM1081, located on APN 178-011-16, Tract 10542, Unit 4, Lot 376. J-Pad, LLC Holder of	No amended Schedule D was filed.

			Security Agreement, dated 11/16/18, Promissory Note (\$175,000 & \$88,000). Matures 2048. . . . Debtor manages 100%.”	
Fifth Amended Schedules, filed November 22, 2021, as Docket #38, Hays Decl. Ex. 7	Debtor scheduled a \$235,000 interest in the Property, indicating that the Property was “Registered to Debtor” with “HCD COTA perfected 1/14/2019.”	Debtor scheduled a 100% interest in J-Sandcastle LLC, adding: “Original purpose of LLC was to hold HCD Registration to Debtor’s residence. HCD Registration was transferred to debtor on 2/25/2021”	Debtor scheduled a 100% interest in J-Pad, LLC, noting: “J-Pad, LLC, Holder of COTA perfected 1/14/2019.”	No amended Schedule D was filed.
Sixth Amended	Debtor scheduled	Debtor	Debtor	No amended

Schedules, filed November 23, 2021, as Docket #39, Hays Decl. Ex. 8	a \$235,000 interest in the property, stating that the Property was “Registered to Debtor. HCD COTA perfected 1/14/2019.”	scheduled a 100% interest in J-Sandcastle LLC, with the same note as in the Fifth Amended Schedules.	scheduled a 100% interest in J-Pad, LLC, with the same note as in the Fifth Amended Schedules.	Schedule D was filed.
Seventh Amended Schedules, filed December 1, 2021, as Docket #42, Hays Decl. Ex. 9	No amended Schedule A/B was filed.	No amended Schedule A/B was filed.	No amended Schedule A/B was filed.	Debtor’s Seventh Amended Schedules list a \$225,000 secured claim of Debtor and Steven and Brian Gallian against the Property.
Eighth Amended Schedules, Filed March 11, 2022, as Docket #72, Hays Decl. Ex. 10	Debtor scheduled a \$235,000 interest in the Property.	Debtor scheduled a 100% interest in J-Sandcastle LLC, noting, among other things, “Debtors	Debtor scheduled a 100% interest in J-Pad, LLC, which she valued at \$500.	No amended Schedule D was filed.

		[sic] primary residence is 16222 Monterey Ln. Unit 376”		
Ninth Amended Schedules, Filed March 15, 2022, as Docket #75, Hays Decl. Ex. 11	No Amended Schedule A/B was filed.	No Amended Schedule A/B was filed.	No Amended Schedule A/B was filed.	Debtor scheduled a \$0 claim against the Property held by the Orange County Assessor; a \$46,138 claim against the Property held by Janine Jasso regarding an Orange County Superior Court (“OCSC”) judgment; \$0 claims against the Property held by Jennifer Paulin, Lindy Beck, Lori

				<p>Burrett, Lee Gragnano, and Theodore Phillips, regarding OCSC judgments; a \$9,265 claim against the Property held by the Huntington Beach Gables Homeowners Association regarding an OCSC judgment; a \$319,653.59 claim against the Property held by the Huntington Beach Gables Homeowners Association regarding an OCSC</p>
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				judgment; a \$0 claim against the Property held by BS Investors LP; a \$0 claim against the Property held by Houser Bros.; a \$0 claim against the Property held by S4, a California Limited Partnership; a \$46,138 claim against the Property held by Huntington Beach Gables Homeowners Association regarding an OCSC judgment; a \$319,653.19
--	--	--	--	--

				claim against the Property held by the Huntington Beach Gables Homeowners Association regarding an OCSC judgment; a \$3,070 claim against the Property held by the Huntington Beach Gables Homeowners Association regarding an OCSC judgment; a \$13,229.34 claim against the Property held by the People of the State of
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				California regarding an OCSC judgment; and a \$13,229.34 claim against the Property held by Janine Jasso for civil attorney's fees regarding an OCSC judgment.
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EXHIBIT 2

Fill in this information to identify your case and this filing:

Debtor 1	Jamie Lynn Gallian		
	First Name	Middle Name	Last Name
Debtor 2			
(Spouse, if filing)	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	CENTRAL DISTRICT OF CALIFORNIA		
Case number			

☐ Check if this is an amended filing

Official Form 106A/B Schedule A/B: Property

12/15

In each category, separately list and describe items. List an asset only once. If an asset fits in more than one category, list the asset in the category where you think it fits best. Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Each Residence, Building, Land, or Other Real Estate You Own or Have an Interest In

1. Do you own or have any legal or equitable interest in any residence, building, land, or similar property?

- ☐ No. Go to Part 2.
- ☒ Yes. Where is the property?

Located on APN 178-011-16, Space No. 376

1.1

16222 Monterey Ln Space #376

Street address, if available, or other description

Huntington Beach CA 92649-0000

City State ZIP Code

Orange

County

Personal Residence of Debtor since 11/1/2018
2014 Skyline Custom Villa Manufactured Home
Decal No. LBM1081
Serial Number AC7V710394GB 56'x15'2"
Serial Number AC7V710394GA 60'x15'2"

What is the property? Check all that apply

- ☐ Single-family home
- ☐ Duplex or multi-unit building
- ☐ Condominium or cooperative
- ☒ Manufactured or mobile home
- ☐ Land
- ☐ Investment property
- ☐ Timeshare
- ☐ Other

Who has an interest in the property? Check one

- ☒ Debtor 1 only
- ☐ Debtor 2 only
- ☐ Debtor 1 and Debtor 2 only
- ☐ At least one of the debtors and another

Do not deduct secured claims or exemptions. Put the amount of any secured claims on *Schedule D: Creditors Who Have Claims Secured by Property*.

Current value of the entire property?

\$235,000.00

Current value of the portion you own?

\$235,000.00

Describe the nature of your ownership interest (such as fee simple, tenancy by the entireties, or a life estate), if known.

Fee simple

☐ Check if this is community property (see instructions)

Other information you wish to add about this item, such as local property identification number: LPT APN 891-569-62

Registered Title with HCD Debtor's single member LLC, J-Sandcastle Co, LLC

2. Add the dollar value of the portion you own for all of your entries from Part 1, including any entries for pages you have attached for Part 1. Write that number here.....>

\$235,000.00

Part 2: Describe Your Vehicles

Do you own, lease, or have legal or equitable interest in any vehicles, whether they are registered or not? Include any vehicles you own that someone else drives. If you lease a vehicle, also report it on *Schedule G: Executory Contracts and Unexpired Leases*.

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Debtor 1 **Jamie Lynn Gallian**

Case number (if known) _____

3. Cars, vans, trucks, tractors, sport utility vehicles, motorcycles

☐ No

☒ Yes

3.1 Make: **Kia**
Model: **Sportage**
Year: **2020**
Approximate mileage: _____
Other information: _____

**Location: 16222 Monterey Ln
#376, Huntington Beach CA
92649
(LEASE)**

Who has an interest in the property? Check one

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

☐ Check if this is community property
(see instructions)

Do not deduct secured claims or exemptions. Put
the amount of any secured claims on *Schedule D:
Creditors Who Have Claims Secured by Property*.

**Current value of the
entire property?**

**Current value of the
portion you own?**

\$0.00

\$0.00

4. Watercraft, aircraft, motor homes, ATVs and other recreational vehicles, other vehicles, and accessories

Examples: Boats, trailers, motors, personal watercraft, fishing vessels, snowmobiles, motorcycle accessories

☒ No

☐ Yes

**5 Add the dollar value of the portion you own for all of your entries from Part 2, including any entries for
pages you have attached for Part 2. Write that number here.....=>**

\$0.00

Part 3: Describe Your Personal and Household Items

Do you own or have any legal or equitable interest in any of the following items?

**Current value of the
portion you own?**
Do not deduct secured
claims or exemptions.

6. Household goods and furnishings

Examples: Major appliances, furniture, linens, china, kitchenware

☐ No

☒ Yes. Describe.....

Location: 16222 Monterey Ln #376, Huntington Beach CA 92649

\$4,500.00

7. Electronics

*Examples: Televisions and radios; audio, video, stereo, and digital equipment; computers, printers, scanners; music collections; electronic devices
including cell phones, cameras, media players, games*

☒ Yes. Describe

Wall Television, Computer, Printer.

\$ 500.00

☐ No.

Location: 16222 Monterey Ln #376, Huntington Beach CA 92649

8. Collectibles of value

*Examples: Antiques and figurines; paintings, prints, or other artwork; books, pictures, or other art objects; stamp, coin, or baseball card collections;
other collections, memorabilia, collectibles*

☒ No

☐ Yes. Describe.....

9. Equipment for sports and hobbies

*Examples: Sports, photographic, exercise, and other hobby equipment; bicycles, pool tables, golf clubs, skis; canoes and kayaks; carpentry tools;
musical instruments*

☒ No

☐ Yes. Describe.....

10. Firearms

Examples: Pistols, rifles, shotguns, ammunition, and related equipment

☒ No

☐ Yes. Describe.....

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Debtor 1 **Jamie Lynn Gallian**

Case number (if known)

11. Clothes

Examples: Everyday clothes, furs, leather coats, designer wear, shoes, accessories

☐ No

☒ Yes. Describe.....

Location: 16222 Monterey Ln #376, Huntington Beach CA 92649

\$1,000.00

12. Jewelry

Examples: Everyday jewelry, costume jewelry, engagement rings, wedding rings, heirloom jewelry, watches, gems, gold, silver

☒ Yes. Describe

20 year old Movado Wrist-watch 40th birthday gift; Costume jewelry from Mother and Grandmother Misc/ sized rings, various non-gold chains and bracelets, earrings.

\$1,000.00

☐ No

Location: 16222 Monterey Ln #376, Huntington Beach CA 92649

13. Non-farm animals

Examples: Dogs, cats, birds, horses

☒ Yes. Describe

5-year old Rescued Wired Terrier Dog-White "Ammie"

☐ No.

Location: 16222 Monterey Ln #376, Huntington Beach CA 92649

14. Any other personal and household items you did not already list, including any health aids you did not list

☒ No

☐ Yes. Give specific information.....

15. Add the dollar value of all of your entries from Part 3, including any entries for pages you have attached for Part 3. Write that number here

\$7,000.00

Part 4: Describe Your Financial Assets

Do you own or have any legal or equitable interest in any of the following?

Current value of the
portion you own?
Do not deduct secured
claims or exemptions.

16. Cash

Examples: Money you have in your wallet, in your home, in a safe deposit box, and on hand when you file your petition

☒ No

☐ Yes.....

17. Deposits of money

Examples: Checking, savings, or other financial accounts; certificates of deposit; shares in credit unions, brokerage houses, and other similar institutions. If you have multiple accounts with the same institution, list each.

☐ No

☒ Yes.....

Institution name:

17.1 Checking and savings

J-Sandcastle Co LLC - Chase - Un-cashed Tendered Space 376 Rent Checks
Alliant Credit Union (Personal) Stimulus Ck

\$ 8,050.00

\$ 4,048.34

18. Bonds, mutual funds, or publicly traded stocks

Examples: Bond funds, investment accounts with brokerage firms, money market accounts

☒ No

☐ Yes.....

Institution or issuer name:

19. Non-publicly traded stock and interests in incorporated and unincorporated businesses, including an interest in an LLC, partnership, and joint venture

☐ No

☒ Yes. Give specific information about them.....

Name of entity:

% of ownership:

J-Sandcastle Co., LLC - Debtor's single member
LLC
(Purpose is to hold Registered title with HCD, to
Debtor's primary residence) LBM1081

100 %

\$0.00

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Debtor 1 Jamie Lynn Gallian

Case number (if known) _____

J-Pad, LLC

(Debtor owns 1/3 interest in LLC; only purpose
is to hold a note and UCC-1 filing on Debtor's
primary residence) LBM1081

33.33

%

\$0.00

20. Government and corporate bonds and other negotiable and non-negotiable instruments

Negotiable instruments include personal checks, cashiers' checks, promissory notes, and money orders.

Non-negotiable instruments are those you cannot transfer to someone by signing or delivering them.

☒ No

☐ Yes. Give specific information about them

Issuer name: _____

21. Retirement or pension accounts

Examples: Interests in IRA, ERISA, Keogh, 401(k), 403(b), thrift savings accounts, or other pension or profit-sharing plans

☐ No

☒ Yes. List each account separately.

Type of account:

Institution name:

IRA

Fidelity

\$7,400.00

22. Security deposits and prepayments

Your share of all unused deposits you have made so that you may continue service or use from a company

Examples: Agreements with landlords, prepaid rent, public utilities (electric, gas, water), telecommunications companies, or others

No

☒ Yes.

Institution name or individual:

Houser Bros Co. dba Rancho Del Rey Mobilehome Estates

Ground Lease Deposit (Ryan) Agreement Space 376 - 1/1/2006

\$ 686.00

23. Annuities (A contract for a periodic payment of money to you, either for life or for a number of years)

☒ No

☐ Yes..... Issuer name and description.

24. Interests in an education IRA, in an account in a qualified ABLE program, or under a qualified state tuition program.

26 U.S.C. §§ 530(b)(1), 529A(b), and 529(b)(1).

☒ No

☐ Yes..... Institution name and description. Separately file the records of any interests. 11 U.S.C. § 521(c):

25. Trusts, equitable or future interests in property (other than anything listed in line 1), and rights or powers exercisable for your benefit

☒ No

☐ Yes. Give specific information about them...

26. Patents, copyrights, trademarks, trade secrets, and other intellectual property

Examples: Internet domain names, websites, proceeds from royalties and licensing agreements

☒ No

☐ Yes. Give specific information about them...

27. Licenses, franchises, and other general intangibles

Examples: Building permits, exclusive licenses, cooperative association holdings, liquor licenses, professional licenses

☒ No

☐ Yes. Give specific information about them...

Money or property owed to you?

**Current value of the
portion you own?**

Do not deduct secured
claims or exemptions.

28. Tax refunds owed to you

☒ No

☐ Yes. Give specific information about them, including whether you already filed the returns and the tax years.....

29. Family support

Examples: Past due or lump sum alimony, spousal support, child support, maintenance, divorce settlement, property settlement

☒ No

Official Form 106A/B

Schedule A/B: Property

page 4

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Debtor 1 Jamie Lynn Gallian

Case number (if known) _____

☐ Yes. Give specific information.....

30. Other amounts someone owes you

Examples: Unpaid wages, disability insurance payments, disability benefits, sick pay, vacation pay, workers' compensation, Social Security benefits; unpaid loans you made to someone else

☒ No

☐ Yes. Give specific information..

31. Interests in insurance policies

Examples: Health, disability, or life insurance; health savings account (HSA); credit, homeowner's, or renter's insurance

☒ No

☐ Yes. Name the insurance company of each policy and list its value.

Company name:

Beneficiary:

Surrender or refund
value:

32. Any interest in property that is due you from someone who has died

If you are the beneficiary of a living trust, expect proceeds from a life insurance policy, or are currently entitled to receive property because someone has died.

No

Father, DOD 6/17/2000, Charles J. Bradley, Jr. Probate OCSC
30-2017-00915711

\$ unknown

☒ Yes. Give specific information..

33. Claims against third parties, whether or not you have filed a lawsuit or made a demand for payment

Examples: Accidents, employment disputes, insurance claims, or rights to sue

No

☒ Yes. Describe each claim.....

Personal Injury: Against HOA Date of Injury 8/5/2018; Severe nerve injury to
top of left foot and left wrist injury; occurred in the HOA common area of APN
178-771-03, located on APN 178-011-16,

\$ unknown

34. Other contingent and unliquidated claims of every nature, including counterclaims of the debtor and rights to set off claims

☐ No

☒ Yes. Describe each claim.....

Personal injury claims against Huntington Beach Gables
Homeowner's Association and Ind. Jesus Jasso Jr.;
DOI: 8/5/2018; Case No.: 30-2020-01153679

\$ unknown

Potential insurance bad faith claim against Mercury

Insurance Failure to Indemnify; No lawsuit filed yet.
Related to Case No(s): 30-2017-00913985, 30-2017-00962999

\$ unknown

Real estate failure to disclose, claim against previous

homeowner Sandra Bradley; DOI: 04/11/2017; No lawsuit
filed yet.

\$ unknown

Houser Bros Co GP dba Rancho Del Rey Mobilehome Estates

Retaliation; Trespassing/Unlawful Entry; Wrongful Eviction;
Forcible Detainer; Cruelty to an animal causing death.
Failure to offer and execute rental agreement.

\$ unknown

35. Any financial assets you did not already list

☒ No

☐ Yes. Give specific information..

36. Add the dollar value of all of your entries from Part 4, including any entries for pages you have attached for Part 4. Write that number here.....

\$20,184.34

Part 5: Describe Any Business-Related Property You Own or Have an Interest In. List any real estate in Part 1.

37. Do you own or have any legal or equitable interest in any business-related property?

☒ No. Go to Part 6.

☐ Yes. Go to line 38.

Official Form 106A/B

Schedule A/B: Property

page 5

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Debtor 1 Jamie Lynn Gallian

Case number (if known) _____

Part 6: Describe Any Farm- and Commercial Fishing-Related Property You Own or Have an Interest In.
If you own or have an interest in farmland, list it in Part 1.

46. Do you own or have any legal or equitable interest in any farm- or commercial fishing-related property?

☒ No. Go to Part 7.

☐ Yes. Go to line 47.

Part 7: Describe All Property You Own or Have an Interest in That You Did Not List Above

53. Do you have other property of any kind you did not already list?

Examples: Season tickets, country club membership

☒ No

☐ Yes. Give specific information.....

54. Add the dollar value of all of your entries from Part 7. Write that number here

\$0.00

Part 8: List the Totals of Each Part of this Form

55. Part 1: Total real estate, line 2		\$235,000.00
56. Part 2: Total vehicles, line 5	\$0.00	
57. Part 3: Total personal and household items, line 15	\$ 7,000.00	
58. Part 4: Total financial assets, line 36	\$ 20,184.34	
59. Part 5: Total business-related property, line 45	\$0.00	
60. Part 6: Total farm- and fishing-related property, line 52	\$0.00	
61. Part 7: Total other property not listed, line 54	\$0.00	
	+	
62. Total personal property. Add lines 56 through 61...	\$27,184.34	Copy personal property total \$27,184.34
63. Total of all property on Schedule A/B. Add line 55 + line 62		\$262,184.34

Fill in this information to identify your case:

Debtor 1	Jamie Lynn Gallian		
	First Name	Middle Name	Last Name
Debtor 2			
(Spouse if, filing)	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	CENTRAL DISTRICT OF CALIFORNIA		
Case number (if known)			

☐ Check if this is an amended filing

Official Form 106D

Schedule D: Creditors Who Have Claims Secured by Property

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, copy the Additional Page, fill it out, number the entries, and attach it to this form. On the top of any additional pages, write your name and case number (if known).

1. Do any creditors have claims secured by your property?

- ☐ No. Check this box and submit this form to the court with your other schedules. You have nothing else to report on this form.
- ☒ Yes. Fill in all of the information below.

Part 1: List All Secured Claims

2. List all secured claims. If a creditor has more than one secured claim, list the creditor separately for each claim. If more than one creditor has a particular claim, list the other creditors in Part 2. As much as possible, list the claims in alphabetical order according to the creditor's name.

	Column A	Column B	Column C
	Amount of claim Do not deduct the value of collateral.	Value of collateral that supports this claim	Unsecured portion if any
2.1 Houser Bros. Co.	\$0.00	\$235,000.00	\$0.00
<small>Creditor's Name</small> DBA Rancho Del Rey Mobilehome Estates 16222 Monterey Ln Huntington Beach, CA 92649			
<small>Describe the property that secures the claim:</small> 16222 Monterey Ln #376 Huntington Beach, CA 92649 Orange County Registered HCD Title held by Debtor's single member LLC - J-Sandcastle Co, LLC			
<small>As of the date you file, the claim is: Check all that apply.</small> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed			
<small>Nature of lien. Check all that apply.</small> <input type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input type="checkbox"/> Judgment lien from a lawsuit			
<small>Who owes the debt? Check one.</small> <input checked="" type="checkbox"/> Debtor 1 and another (J-Sandcastle Co, LLC) <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim relates to a community debt			
<input checked="" type="checkbox"/> Other (including a right to offset)			
Unexpired term of 80-yr. Ground Leasehold - Tract No. 10542, Unit 4, Space 376.			
<small>Date debt was incurred</small> 11/1/2018 ongoing <small>Last 4 digits of account number</small> 0376			

Debtor 1 **Jamie Lynn Gallian**

First Name Middle Name Last Name

Case number (if known)

2.2 J-Pad, LLC

Creditor's Name
4519 Ponderosa Way
Yorba Linda, CA 92886

Number, Street, City, State & Zip Code

Ron Pierpont

Creditor's Name
4519 Ponderosa Way
Yorba Linda, CA 92886

Who owes the debt? Check one.

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim relates to a community debt

Date debt was incurred **1/14/2019;**
8/20/2020.

Describe the property that secures the claim:

16222 Monterey Ln #376 Huntington Beach, CA 92649 Orange County, HCD Title held by Debtor's single member LLC - J-Sandcastle Co, LLC

As of the date you file, the claim is: Check all that apply.

- ☐ Contingent
☐ Unliquidated
☐ Disputed

Nature of lien. Check all that apply.

- ☒ An agreement you made (such as mortgage or secured car loan) **Manufactured Home Financing Note**
☐ Statutory lien (such as tax lien, mechanic's lien)
☐ Judgment lien from a lawsuit
☒ Other (including a right to offset) **UCC-1 File No. 19-7691905279 Filing Date: 1/14/2019;**

Encumbrance; HCD Lien perfected 8/20/2020, Ronald J. Pierpont (Loan WJC 8/7/2019, 1/27/2020)

Last 4 digits of account number **1BM1081**

\$175,000.00 \$235,000.00 \$0.00

2.3 Kia Motors Finance

Creditor's Name

PO Box 20815
Fountain Valley, CA
92728

Number, Street, City, State & Zip Code

Who owes the debt? Check one.

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim relates to a community debt

Date debt was incurred

Last 4 digits of account number **9742**

Describe the property that secures the claim:

2020 Kia Sportage
Location: 16222 Monterey Ln #376,
Huntington Beach CA 92649
(LEASE)

As of the date you file, the claim is: Check all that apply.

- ☐ Contingent
☐ Unliquidated
☐ Disputed

Nature of lien. Check all that apply.

- ☐ An agreement you made (such as mortgage or secured car loan)
☐ Statutory lien (such as tax lien, mechanic's lien)
☐ Judgment lien from a lawsuit
☒ Other (including a right to offset) **Auto Lease**

\$4,186.00 \$0.00 \$4,186.00

2.4 Orange County Tax Assessor

Creditor's Name

P.O. Box 149
Santa Ana, CA 92702

Number, Street, City, State & Zip Code

Who owes the debt? Check one.

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim relates to a community debt

Date debt was incurred

Last 4 digits of account number **Decal LBM 1081; APN: 891-569-62**

Describe the property that secures the claim:

16222 Monterey Ln #376 Huntington Beach, CA 92649 Orange County Title held by Debtor's single member LLC - J-Sandcastle Co, LLC, APN 891-569-62

As of the date you file, the claim is: Check all that apply.

- ☐ Contingent
☐ Unliquidated
☐ Disputed

Nature of lien. Check all that apply.

- ☐ An agreement you made (such as mortgage or secured car loan)
☐ Statutory lien (such as tax lien, mechanic's lien)
☐ Judgment lien from a lawsuit
☒ Other (including a right to offset) **Property Taxes**

\$0.00 \$235,000.00 \$0.00

Debtor 1 **Jamie Lynn Gallian**

First Name Middle Name Last Name

Case number (if known)

**2.5 The Huntington Beach
Gables Homeowners
Association**

Creditor's Name
c/o Epsten Grinnell & Howell,
APC
10200 Willow Creek Road, Ste
100
San Diego, CA 92131;
c/o Feldsott & Lee
23161 Mill Creek Drive Ste 300
Laguna Hills, CA 92653
Number, Street, City, State & Zip Code

Describe the property that secures the claim:

16222 Monterey Ln #376 Huntington
Beach, CA 92649 Orange County HCD
Title held by Debtor's single member
LLC - J-Sandcastle Co, LLC

\$319,653.59

\$235,000.00

\$241,319.59

As of the date you file, the claim is: Check all that
apply.

☐ Contingent

☐ Unliquidated

☐ Disputed

Nature of lien. Check all that apply.

☐ An agreement you made (such as mortgage or secured
car loan)

☐ Statutory lien (such as tax lien, mechanic's lien)

☒ Judgment lien from a lawsuit

☐ Other (including a right to offset)

Who owes the debt? Check one.

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

☐ Check if this claim relates to a
community debt

EJ-1

Date debt was incurred **May 6, 2019**

Last 4 digits of account number **OCJC 30-2017-00913985**

**2.6 The Huntington Beach
Gables Homeowners
Association**

Creditor's Name
c/o Epsten Grinnell & Howell, APC
10200 Willow Creek Road, Ste 100
San Diego, CA 92131;
c/o Feldsott & Lee
23161 Mill Creek Drive Ste 300
Laguna Hills, CA 92653
Number, Street, City, State & Zip Code

Describe the property that secures the claim:

16222 Monterey Ln #376 Huntington
Beach, CA 92649 Orange County HCD
Title held by Debtor's single member
LLC - J-Sandcastle Co, LLC

\$9,265.00

\$235,000.00

\$9,265.00

As of the date you file, the claim is: Check all that
apply.

☐ Contingent

☐ Unliquidated

☐ Disputed

Nature of lien. Check all that apply.

☐ An agreement you made (such as mortgage or secured
car loan)

☐ Statutory lien (such as tax lien, mechanic's lien)

☒ Judgment lien from a lawsuit

☐ Other (including a right to offset)

Who owes the debt? Check one.

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

☐ Check if this claim relates to a
community debt

EJ-001 2019000148568 - filed OC REC. 5/3/2019

Date debt was incurred **March 21, 2019**

Last 4 digits of account number **OCJC 30-2017-00962999**

Debtor 1 **Jamie Lynn Gallian**

First Name Middle Name Last Name

Case number (if known)

2.7 **Huntington Beach Gables
Homeowners Association**

Creditor's Name:

**Jasso; Gragnano; Phillips; Beck;
Paulin; Burrett.
c/o Gordon Rees Scully & Mansukhani
633 W 5th Street, 52nd Floor
Los Angeles, CA 90071
c/o Epstein Grinnell & Howell, APC
10200 Willow Creek Road, Ste 100
San Diego, CA 92131;**

Number, Street, City, State & Zip Code

Describe the property that secures the claim:

**16222 Monterey Ln #376 Huntington
Beach, CA 92649 Orange County HCD
Title held by Debtor's single member
LLC - J-Sandcastle Co, LLC**

\$53,684.41

\$235,000.00

\$53,684.41

As of the date you file, the claim is: Check all that apply.

☐ Contingent

☐ Unliquidated

☐ Disputed

Nature of lien. Check all that apply.

☐ An agreement you made (such as mortgage or secured car loan)

☐ Statutory lien (such as tax lien, mechanic's lien)

☐ Judgment lien from a lawsuit

☒ Other (including a right to offset)

Judgment Lien (JL1) File # U200003862424 -7/26/2020

Who owes the debt? Check one.

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

☐ Check if this claim relates to a community debt

Date debt was incurred **Dec. 4, 2018**

Last 4 digits of account number **OCJC 30-2017-00913985**

Add the dollar value of your entries in Column A on this page. Write that number here:

\$561,789.00

If this is the last page of your form, add the dollar value totals from all pages.

Write that number here:

\$561,789.00

Part 2: List Others to Be Notified for a Debt That You Already Listed

Use this page only if you have others to be notified about your bankruptcy for a debt that you already listed in Part 1. For example, if a collection agency is trying to collect from you for a debt you owe to someone else, list the creditor in Part 1, and then list the collection agency here. Similarly, if you have more than one creditor for any of the debts that you listed in Part 1, list the additional creditors here. If you do not have additional persons to be notified for any debts in Part 1, do not fill out or submit this page.

EXHIBIT 3

Fill in this information to identify your case and this filing:

Debtor 1	Jamie Lynn Gallian		
	First Name	Middle Name	Last Name
Debtor 2 (Spouse, if filing)			
	First Name	Middle Name	Last Name
United States Bankruptcy Court for the: CENTRAL DISTRICT OF CALIFORNIA--SANTA ANA DIVISION			
Case number	8:21-bk-11710-ES		

☐ Check if this is an amended filing

Official Form 106A/B
Schedule A/B: Property

12/15

In each category, separately list and describe items. List an asset only once. If an asset fits in more than one category, list the asset in the category where you think it fits best. Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Each Residence, Building, Land, or Other Real Estate You Own or Have an Interest In

1. Do you own or have any legal or equitable interest in any residence, building, land, or similar property?

☐ No. Go to Part 2.

☒ Yes. Where is the property?

Located on APN 178-011-01
Tract 10542, Unit 4, Lot 376

1.1
16222 Monterey Ln. Spc 376
Street address, if available, or other description

Huntington Beach CA 92649-0000
City State ZIP Code

Orange
County

What is the property? Check all that apply

- ☒ Single-family home
☐ Duplex or multi-unit building
☐ Condominium or cooperative
☒ Manufactured or mobile home
☐ Land
☐ Investment property
☐ Timeshare
☐ Other

Do not deduct secured claims or exemptions. Put the amount of any secured claims on *Schedule D: Creditors Who Have Claims Secured by Property*.

Current value of the entire property?	Current value of the portion you own?
\$235,000.00	\$235,000.00

Describe the nature of your ownership interest (such as fee simple, tenancy by the entireties, or a life estate), if known.

Who has an interest in the property? Check one

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another

☐ Check if this is community property (see instructions)

Other information you wish to add about this item, such as local property identification number:

APN: 891-569-62; Lot 376; LBM 1081; 2014 Skyline Custom Villa
Manufactured Home. Serial Number AC7V710394GB, 56'x15'2"; Serial
Number AC7V710394GA. 60'x15'2". Registered Owner, Jamie Lynn Gallian
with HCD perfected 2/25/2021

2. Add the dollar value of the portion you own for all of your entries from Part 1, including any entries for pages you have attached for Part 1. Write that number here.....=>

\$235,000.00

Part 2: Describe Your Vehicles

Do you own, lease, or have legal or equitable interest in any vehicles, whether they are registered or not? Include any vehicles you own that someone else drives. If you lease a vehicle, also report it on *Schedule G: Executory Contracts and Unexpired Leases*.

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Debtor 1 Jamie Lynn Gallian

Case number (if known) 8:21-bk-11710-ES

3. Cars, vans, trucks, tractors, sport utility vehicles, motorcycles

- ☒ No
☐ Yes

4. Watercraft, aircraft, motor homes, ATVs and other recreational vehicles, other vehicles, and accessories
Examples: Boats, trailers, motors, personal watercraft, fishing vessels, snowmobiles, motorcycle accessories

- ☒ No
☐ Yes

5. Add the dollar value of the portion you own for all of your entries from Part 2, including any entries for pages you have attached for Part 2. Write that number here.....=>

\$0.00

Part 3: Describe Your Personal and Household Items

Do you own or have any legal or equitable interest in any of the following items?

Current value of the
portion you own?
Do not deduct secured
claims or exemptions.

6. Household goods and furnishings

Examples: Major appliances, furniture, linens, china, kitchenware

- ☐ No
☒ Yes. Describe.....

Misc. household goods and furnishings
Location: 16222 Monterey Lane, Space 376, Huntington Beach CA
92649

\$3,500.00

waterford crystal set red and white wine glasses

\$1,000.00

7. Electronics

Examples: Televisions and radios; audio, video, stereo, and digital equipment; computers, printers, scanners; music collections; electronic devices including cell phones, cameras, media players, games

- ☐ No
☒ Yes. Describe.....

Wall television, computer, printer and peripherals
Location: 16222 Monterey Lane, Space 376, Huntington Beach CA
92649

\$500.00

8. Collectibles of value

Examples: Antiques and figurines; paintings, prints, or other artwork; books, pictures, or other art objects; stamp, coin, or baseball card collections; other collections, memorabilia, collectibles

- ☐ No
☒ Yes. Describe.....

Lladro figurine collection (20)

\$1,900.00

9. Equipment for sports and hobbies

Examples: Sports, photographic, exercise, and other hobby equipment; bicycles, pool tables, golf clubs, skis; canoes and kayaks; carpentry tools; musical instruments

- ☒ No
☐ Yes. Describe.....

10. Firearms

Examples: Pistols, rifles, shotguns, ammunition, and related equipment

- ☒ No
☐ Yes. Describe.....

Official Form 106A/B

Schedule A/B: Property

page 2

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Debtor 1 Jamie Lynn Gallian

Case number (if known) 8:21-bk-11710-ES

11. Clothes

Examples: Everyday clothes, furs, leather coats, designer wear, shoes, accessories

☐ No

☒ Yes. Describe.....

Misc. clothing

Location: 16222 Monterey Lane, Space 376, Huntington Beach CA
92649

\$1,000.00

12. Jewelry

Examples: Everyday jewelry, costume jewelry, engagement rings, wedding rings, heirloom jewelry, watches, gems, gold, silver

☐ No

☒ Yes. Describe.....

Movado wrist watch (20 yrs. old); costume jewelry, misc. non-gold
chains/bracelets, and earrings.

Location: 16222 Monterey Lane, Space 376, Huntington Beach CA
92649

\$1,000.00

13. Non-farm animals

Examples: Dogs, cats, birds, horses

☐ No

☒ Yes. Describe.....

5-year old Wired Terrier Dog

\$25.00

14. Any other personal and household items you did not already list, including any health aids you did not list

☒ No

☐ Yes. Give specific information.....

**15. Add the dollar value of all of your entries from Part 3, including any entries for pages you have attached
for Part 3. Write that number here**

\$8,925.00

Part 4: Describe Your Financial Assets

Do you own or have any legal or equitable interest in any of the following?

Current value of the
portion you own?
Do not deduct secured
claims or exemptions.

16. Cash

Examples: Money you have in your wallet, in your home, in a safe deposit box, and on hand when you file your petition

☒ No

☐ Yes.....

17. Deposits of money

Examples: Checking, savings, or other financial accounts; certificates of deposit; shares in credit unions, brokerage houses, and other similar
institutions. If you have multiple accounts with the same institution, list each.

☐ No

☒ Yes.....

Institution name:

17.1. **EDD Debit account** Bank of America

\$3,793.00

17.2. **Savings**

Alliant Credit Union--Only funds are Covid-19
relief funds from the government.

\$1,407.00

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Debtor 1 Jamie Lynn Gallian

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17.3. **Savings**

Alliant Credit Union--Only funds are Covid-19 relief funds from the government.

\$2,600.00

18. **Bonds, mutual funds, or publicly traded stocks**

Examples: Bond funds, investment accounts with brokerage firms, money market accounts

☒ No

☐ Yes.....

Institution or issuer name:

19. **Non-publicly traded stock and interests in incorporated and unincorporated businesses, including an interest in an LLC, partnership, and joint venture**

☐ No

☒ Yes. Give specific information about them.....

Name of entity:

% of ownership:

J-Sandcastle Co, LLC. Entity currently has a bank account of less than \$2,000 assets.

Original purpose of LLC was to hold HCD Registration to Debtor's residence. HCD Registration was transferred to debtor on 2/25/2021. According to the Mobilehome Park Management Houser Bros, park rules forbid home to be held in name other than an individual.

100 %

\$2,000.00

J-PAD, LLC. Entity Assets include bank account of around \$4,000;

Certificate of Title with HCD, perfected 1/14/2019, LBM 1081; 2014 Skyline Custom Villa Manufactured Home UCC-1 Manufactured Home Financing Statement perfected 1/14/2019, against personal property located at 16222 Monterey Lane, Space 376, Huntington Beach, CA. 92649

33.33 %

\$59,666.00

20. **Government and corporate bonds and other negotiable and non-negotiable instruments**

Negotiable instruments include personal checks, cashiers' checks, promissory notes, and money orders.

Non-negotiable instruments are those you cannot transfer to someone by signing or delivering them.

☒ No

☐ Yes. Give specific information about them

Issuer name:

21. **Retirement or pension accounts**

Examples: Interests in IRA, ERISA, Keogh, 401(k), 403(b), thrift savings accounts, or other pension or profit-sharing plans

☐ No

☒ Yes. List each account separately.

Type of account:

Institution name:

IRA

Fidelity

\$7,400.00

22. **Security deposits and prepayments**

Your share of all unused deposits you have made so that you may continue service or use from a company

Examples: Agreements with landlords, prepaid rent, public utilities (electric, gas, water), telecommunications companies, or others

☐ Yes

☒ No.

Institution name or individual:

23. **Annuities** (A contract for a periodic payment of money to you, either for life or for a number of years)

☒ No

☐ Yes..... Issuer name and description.

24. **Interests in an education IRA, in an account in a qualified ABLE program, or under a qualified state tuition program.**

26 U.S.C. §§ 530(b)(1), 529A(b), and 529(b)(1).

Official Form 106A/B

Schedule A/B: Property

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Debtor 1 Jamie Lynn Gallian

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☒ No

☐ Yes..... Institution name and description. Separately file the records of any interests.11 U.S.C. § 521(c):

25. **Trusts, equitable or future interests in property (other than anything listed in line 1), and rights or powers exercisable for your benefit**

☒ No

☐ Yes. Give specific information about them...

26. **Patents, copyrights, trademarks, trade secrets, and other intellectual property**

Examples: Internet domain names, websites, proceeds from royalties and licensing agreements

☒ No

☐ Yes. Give specific information about them...

27. **Licenses, franchises, and other general intangibles**

Examples: Building permits, exclusive licenses, cooperative association holdings, liquor licenses, professional licenses

☒ No

☐ Yes. Give specific information about them...

Money or property owed to you?

Current value of the
portion you own?
Do not deduct secured
claims or exemptions.

28. **Tax refunds owed to you**

☒ No

☐ Yes. Give specific information about them, including whether you already filed the returns and the tax years.....

29. **Family support**

Examples: Past due or lump sum alimony, spousal support, child support, maintenance, divorce settlement, property settlement

☒ No

☐ Yes. Give specific information.....

30. **Other amounts someone owes you**

Examples: Unpaid wages, disability insurance payments, disability benefits, sick pay, vacation pay, workers' compensation, Social Security benefits; unpaid loans you made to someone else

☒ No

☐ Yes. Give specific information..

31. **Interests in insurance policies**

Examples: Health, disability, or life insurance; health savings account (HSA); credit, homeowner's, or renter's insurance

☒ No

☐ Yes. Name the insurance company of each policy and list its value.

Company name:

Beneficiary:

Surrender or refund
value:

32. **Any interest in property that is due you from someone who has died**

If you are the beneficiary of a living trust, expect proceeds from a life insurance policy, or are currently entitled to receive property because someone has died.

☐ No

☒ Yes. Give specific information..

[32.1]

Probate estate of Father Charles J. Bradley, Jr. DOD 6/18/2000

OCSC Case No. 30-2017-00915711.

Uncertain what, if any, proceeds will pass to debtor.

Unknown

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Debtor 1 Jamie Lynn Gallian

Case number (if known) 8:21-bk-11710-ES

33. Claims against third parties, whether or not you have filed a lawsuit or made a demand for payment
Examples: Accidents, employment disputes, insurance claims, or rights to sue

☒ No
☐ Yes. Describe each claim.....

34. Other contingent and unliquidated claims of every nature, including counterclaims of the debtor and rights to set off claims

☐ No
☒ Yes. Describe each claim.....

[34.1]

Personal Injury claim against Huntington Beach Gables Homeowners Association; Jesus Jasso, Jr. et al. DOI: 8/5/2018
OCSC Case No. 30-2020-01153679.

Unknown

[34.2]

Claim against Houser Bros Co. dba Rancho Del Rey Mobilehome Estates for Violation(s) of Civil Code and MRL §798, et seq. Failure to Offer and countersign Lease Agreement, Lot 376, 2014 manufactured home sold in place 11/1/2018 to debtor. Failure to disclose possible MH park Change of Use; Failure to timely pursue/prosecute frivolous UD claim filed 1/2/19, against Debtor; Multiple acts by park management including retaliation, discrimination, trespassing, unlawful entry; forcible detainer, wrongful eviction. No lawsuit yet filed.

Unknown

35. Any financial assets you did not already list

☐ No
☒ Yes. Give specific information..

[35..1]

Possible Victim Restitution Order against Jesus Jasso Jr. for battery, Penal Code §242
OCDA Criminal Case, People of the State of California vs Jesus Jasso Jr.
OCSC Case No. 19WM09951 Estimated loss of income \$73,000.00

Unknown

[35.2]

Possible COVID-19 Rent Relief Act from State of California
(Applied for June 2021, but not yet approved). Not property of the estate.

\$27,000.00

36. Add the dollar value of all of your entries from Part 4, including any entries for pages you have attached for Part 4. Write that number here.....

\$103,866.00

Part 5: Describe Any Business-Related Property You Own or Have an Interest In. List any real estate in Part 1.

Official Form 106A/B

Schedule A/B: Property

page 6

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Best Case Bankruptcy

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Debtor 1 Jamie Lynn Gallian

Case number (if known) 8:21-bk-11710-ES

37. Do you own or have any legal or equitable interest in any business-related property?

☒ No. Go to Part 6.

☐ Yes. Go to line 38.

Part 6: Describe Any Farm- and Commercial Fishing-Related Property You Own or Have an Interest In.
If you own or have an interest in farmland, list it in Part 1.

46. Do you own or have any legal or equitable interest in any farm- or commercial fishing-related property?

☒ No. Go to Part 7.

☐ Yes. Go to line 47.

Part 7: Describe All Property You Own or Have an Interest in That You Did Not List Above

53. Do you have other property of any kind you did not already list?

Examples: Season tickets, country club membership

☒ No

☐ Yes. Give specific information.....

54. Add the dollar value of all of your entries from Part 7. Write that number here

\$0.00

Part 8: List the Totals of Each Part of this Form

55. Part 1: Total real estate, line 2		<u>\$235,000.00</u>
56. Part 2: Total vehicles, line 5	<u>\$0.00</u>	
57. Part 3: Total personal and household items, line 15	<u>\$8,925.00</u>	
58. Part 4: Total financial assets, line 36	<u>\$103,866.00</u>	
59. Part 5: Total business-related property, line 45	<u>\$0.00</u>	
60. Part 6: Total farm- and fishing-related property, line 52	<u>\$0.00</u>	
61. Part 7: Total other property not listed, line 54	<u>\$0.00</u>	
	+	
62. Total personal property. Add lines 56 through 61...	<u>\$112,791.00</u>	
		Copy personal property total <u>\$112,791.00</u>
63. Total of all property on Schedule A/B. Add line 55 + line 62		<u>\$347,791.00</u>

EXHIBIT 4

Fill in this information to identify your case and this filing:

Debtor 1	Jamie Lynn Gallian		
	First Name	Middle Name	Last Name
Debtor 2 (Spouse, if filing)			
	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	CENTRAL DISTRICT OF CALIFORNIA--SANTA ANA DIVISION		
Case number	8:21-bk-11710-ES		

☐ Check if this is an amended filing

Official Form 106A/B Schedule A/B: Property

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In each category, separately list and describe items. List an asset only once. If an asset fits in more than one category, list the asset in the category where you think it fits best. Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Each Residence, Building, Land, or Other Real Estate You Own or Have an Interest In

1. Do you own or have any legal or equitable interest in any residence, building, land, or similar property?

☐ No. Go to Part 2.

☒ Yes. Where is the property?

Located Tract 10542, Unit 4, Lot 376 on APN 178-011-01.

1.1

16222 Monterey Ln. Spc 376

Street address, if available, or other description

Huntington Beach CA 92649-0000

City State ZIP Code

Orange

County

What is the property? Check all that apply

- ☒ Single-family home
☐ Duplex or multi-unit building
☐ Condominium or cooperative
☒ Manufactured or mobile home
☐ Land
☐ Investment property
☐ Timeshare
☐ Other

Do not deduct secured claims or exemptions. Put the amount of any secured claims on *Schedule D: Creditors Who Have Claims Secured by Property*.

Current value of the entire property?
\$235,000.00

Current value of the portion you own?
\$235,000.00

Describe the nature of your ownership interest (such as fee simple, tenancy by the entireties, or a life estate), if known.

Who has an interest in the property? Check one

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another

☐ Check if this is community property (see instructions)

Other information you wish to add about this item, such as local property identification number:

APN: 891-569-62; HCD COT Registration transferred 2/25/2021, from J-Sandcastle Co LLC Debtor's single member LLC, to Debtor, in attempt to end UD litigation and obtain counter-signed Leasehold Agreement with RDRMHE. Debtor Homestead Declaration filed with OC Clerk Recorder 7/9/2021@12:48 p.m.

2. Add the dollar value of the portion you own for all of your entries from Part 1, including any entries for pages you have attached for Part 1. Write that number here.....=>

\$235,000.00

Part 2: Describe Your Vehicles

Do you own, lease, or have legal or equitable interest in any vehicles, whether they are registered or not? Include any vehicles you own that someone else drives. If you lease a vehicle, also report it on *Schedule G: Executory Contracts and Unexpired Leases*.

Debtor 1 **Jamie Lynn Gallian**

Case number (if known) **8:21-bk-11710-ES**

3. **Cars, vans, trucks, tractors, sport utility vehicles, motorcycles**

☒ **YES Lease 2020 Kia Sportage** LOCATION: 16222 MONTEREY LN #376
☐ **No** HUNTINGTON BEACH, CA 92649

4. **Watercraft, aircraft, motor homes, ATVs and other recreational vehicles, other vehicles, and accessories**
Examples: Boats, trailers, motors, personal watercraft, fishing vessels, snowmobiles, motorcycle accessories

☒ **No**
☐ **Yes**

5. **Add the dollar value of the portion you own for all of your entries from Part 2, including any entries for pages you have attached for Part 2. Write that number here.....=>**

\$0.00

Part 3: Describe Your Personal and Household Items

Do you own or have any legal or equitable interest in any of the following items?

Current value of the portion you own?
Do not deduct secured claims or exemptions.

6. **Household goods and furnishings**
Examples: Major appliances, furniture, linens, china, kitchenware

☐ **No**
☒ **Yes. Describe.....**

Misc. household goods and furnishings
Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649

\$3,500.00

waterford crystal red & white wine glasses

\$1,000.00

7. **Electronics**
Examples: Televisions and radios; audio, video, stereo, and digital equipment; computers, printers, scanners; music collections; electronic devices including cell phones, cameras, media players, games

☐ **No**
☒ **Yes. Describe.....**

Wall television, computer, printer and peripherals
Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649

\$500.00

8. **Collectibles of value**
Examples: Antiques and figurines; paintings, prints, or other artwork; books, pictures, or other art objects; stamp, coin, or baseball card collections; other collections, memorabilia, collectibles

☐ **No**
☒ **Yes. Describe.....**

Lladro figurines collection (20)

Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649

\$1,900.00

9. **Equipment for sports and hobbies**
Examples: Sports, photographic, exercise, and other hobby equipment; bicycles, pool tables, golf clubs, skis; canoes and kayaks; carpentry tools; musical instruments

☒ **No**
☐ **Yes. Describe.....**

10. **Firearms**
Examples: Pistols, rifles, shotguns, ammunition, and related equipment

☒ **No**
☐ **Yes. Describe.....**

Official Form 106A/B

Schedule A/B: Property

page 2

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Best Case Bankruptcy

Debtor 1 **Jamie Lynn Gallian**

Case number (if known) **8:21-bk-11710-ES**

11. Clothes

Examples: Everyday clothes, furs, leather coats, designer wear, shoes, accessories

☐ No

☒ Yes. Describe.....

Misc. clothing

Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649

\$1,000.00

12. Jewelry

Examples: Everyday jewelry, costume jewelry, engagement rings, wedding rings, heirloom jewelry, watches, gems, gold, silver

☐ No

☒ Yes. Describe.....

Movado wrist watch (20 yrs. old); costume jewelry, misc. non-gold chains/bracelets, and earrings.

Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649

\$1,000.00

13. Non-farm animals

Examples: Dogs, cats, birds, horses

☐ No

☒ Yes. Describe..... **5-year old Wired Terrier Dog**

Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649

\$25.00

14. Any other personal and household items you did not already list, including any health aids you did not list

☒ No

☐ Yes. Give specific information.....

15. Add the dollar value of all of your entries from Part 3, including any entries for pages you have attached for Part 3. Write that number here

\$8,925.00

Part 4: Describe Your Financial Assets

Do you own or have any legal or equitable interest in any of the following?

Current value of the portion you own? Do not deduct secured claims or exemptions.

16. Cash

Examples: Money you have in your wallet, in your home, in a safe deposit box, and on hand when you file your petition

☒ No

☐ Yes.....

17. Deposits of money

Examples: Checking, savings, or other financial accounts; certificates of deposit; shares in credit unions, brokerage houses, and other similar institutions. If you have multiple accounts with the same institution, list each.

☐ No

☒ Yes.....

Institution name:

17.1. EDD Debit account Bank of America

\$3,793.00

17.2. Savings

Alliant Credit Union

\$1,407.00

Debtor 1 **Jamie Lynn Gallian**

Case number (if known) **8:21-bk-11710-ES**

17.3. **Savings** **Alliant Credit Union** **\$2,600.00**

18. Bonds, mutual funds, or publicly traded stocks

Examples: Bond funds, investment accounts with brokerage firms, money market accounts

☒ No

☐ Yes..... Institution or issuer name:

19. Non-publicly traded stock and interests in incorporated and unincorporated businesses, including an interest in an LLC, partnership, and joint venture

☐ No

☒ Yes. Give specific information about them.....

Name of entity: **J-Sandcastle Co LLC-** Entity currently has \$500.00 in bank account. Debtor Purchased home on 11/1/2018 with proceeds from 10/31/2018 sale of debtors previous residence APN 937-63-053. HCD Registered to J-Sandcastle Co LLC. RDRMHE Park Mgr. refused to countersign 1/1/2006 Ryan Leasehold Agreement, Space 376, to Applicant, J-Sandcastle, Co. LLC. or enter new agreement. J-Sandcastle Co. LLC transferred Registration to Jamie Lynn Gallian, perfected with HCD 2/25/2021 to obtain Lot 376 Leasehold Agreement with RDRMHE. RDRMHE Mgrs. forbid home to be held in name other than individual. However, Park Management allow Registration of MH to be held in the name of a Trust. **% of ownership: 100%**

[19.b] **J-Pad, LLC - Manager-Managed LLC-** Entity has approximately \$7,000.00, from un-cashed space 376 rent checks tendered to RDRMHE, returned to Debtor un-cashed. Only purpose is to hold HCD Certificate of Title, perfected 1/14/2019 of debtors primary residence 2014 Skyline Custom Villa, Decal No. LBM 1081; Serial No. 7V710394GB/GA to protect purchase of 2014 Manufactured Home as debtors primary residence and qualification 1/1/2006 Ryan Ground Leasehold Assigned to Debtor, located on APN 178-011-01 Tract 10542, Unit 4, Lot 376, pending litigation; preservation. **% of ownership: 1/7- th**

20. Government and corporate bonds and other negotiable and non-negotiable instruments

Negotiable instruments include personal checks, cashiers' checks, promissory notes, and money orders.

Non-negotiable instruments are those you cannot transfer to someone by signing or delivering them.

☒ No

☐ Yes. Give specific information about them

Issuer name:

21. Retirement or pension accounts

Examples: Interests in IRA, ERISA, Keogh, 401(k), 403(b), thrift savings accounts, or other pension or profit-sharing plans

☐ No

☒ Yes. List each account separately.

Type of account:

Institution name:

IRA

Fidelity

\$7,400.00

22. Security deposits and prepayments

Your share of all unused deposits you have made so that you may continue service or use from a company

Examples: Agreements with landlords, prepaid rent, public utilities (electric, gas, water), telecommunications companies, or others

☐ Yes

☒ No Institution name or individual:

23. Annuities (A contract for a periodic payment of money to you, either for life or for a number of years)

☒ No

☐ Yes..... Issuer name and description.

24. Interests in an education IRA, in an account in a qualified ABLE program, or under a qualified state tuition program.

26 U.S.C. §§ 530(b)(1), 529A(b), and 529(b)(1).

☒ No

☐ Yes..... Institution name and description. Separately file the records of any interests. 11 U.S.C. § 521(c):

25. Trusts, equitable or future interests in property (other than anything listed in line 1), and rights or powers exercisable for your benefit

☒ No

☐ Yes. Give specific information about them...

Debtor 1 **Jamie Lynn Gallian**

Case number (if known) **8:21-bk-11710-ES**

26. Patents, copyrights, trademarks, trade secrets, and other intellectual property

Examples: Internet domain names, websites, proceeds from royalties and licensing agreements

☒ No

☐ Yes. Give specific information about them...

27. Licenses, franchises, and other general intangibles

Examples: Building permits, exclusive licenses, cooperative association holdings, liquor licenses, professional licenses

☒ No

☐ Yes. Give specific information about them...

Money or property owed to you?

**Current value of the
portion you own?**
Do not deduct secured
claims or exemptions.

28. Tax refunds owed to you

☒ No

☐ Yes. Give specific information about them, including whether you already filed the returns and the tax years.....

29. Family support

Examples: Past due or lump sum alimony, spousal support, child support, maintenance, divorce settlement, property settlement

☒ No

☐ Yes. Give specific information.....

30. Other amounts someone owes you

Examples: Unpaid wages, disability insurance payments, disability benefits, sick pay, vacation pay, workers' compensation, Social Security benefits; unpaid loans you made to someone else

☒ No

☐ Yes. Give specific information..

31. Interests in insurance policies

Examples: Health, disability, or life insurance; health savings account (HSA); credit, homeowner's, or renter's insurance

☒ No

☐ Yes. Name the insurance company of each policy and list its value.

Company name:

Beneficiary:

Surrender or refund
value:

32. Any interest in property that is due you from someone who has died

If you are the beneficiary of a living trust, expect proceeds from a life insurance policy, or are currently entitled to receive property because someone has died.

☐ No

☒ Yes. Give specific information..

Probate estate of Charles J. Bradley, Jr. DOD 6/18/2000
OCSC Case No. 30-2017-00915711.
Uncertain what, if any proceeds will pass to debtor.

Unknown

33. Claims against third parties, whether or not you have filed a lawsuit or made a demand for payment

Examples: Accidents, employment disputes, insurance claims, or rights to sue

☒ No

☐ Yes. Describe each claim.....

34. Other contingent and unliquidated claims of every nature, including counterclaims of the debtor and rights to set off claims

☐ No

☒ Yes. Describe each claim.....

[34.1]

Personal Injury claim filed against Huntington Beach Gables
HOA; Jesus Jasso, Jr., et al.
OCSC Case No. 30-2020-01153679. Date of injury 8/5/2018.

Unknown

Debtor 1 **Jamie Lynn Gallian**

Case number (if known) **8:21-bk-11710-ES**

[34.2]	Possible Victim Restitution Award Order - People of the State of CA vs. Jesus Jasso Jr., PC §242, OCSC Case No. 19WM09951. Claim submitted to OC District Attorney through Victim Witness Agency. \$73,000.00	\$73,000.00
[34.3]	Potential Claim against Houser Bros Co. dba Rancho Del Rey Mobilehome Estates. Violation(s) of MRL §798, et seq.; multiple acts (retaliation, discrimination, trespassing/unlawful entry; forcible detainer, wrongful eviction. Failure to timely pursue/prosecute frivolous UD claim filed 1/2/19, against debtor, bona fide purchaser for value on 11/1/2018. Potential award of attorney fees under MRL.	UNKNOWN
[34.4]	Possible right to reversionary interest in unexpired 80 yr Ground Leasehold and Sub-condominium Leasehold, Lot 1 & 2, Tract 10542, APN 178-011-011 Gables subd. located on APN 178-771-03. Huntington Beach Gables HOA has a cross-complaint in the Nickel complaint pending OCSC 30-2020-01163055, in which Gables HOA seek a voiding of Unit 53 sale and Assignment of unexpired Ground Leasehold and Subcondominium Leasehold October 31, 2018, to bona fide purchaser Randall L. Nickel for valuable consideration. Gallian had a homestead exemption. On November 1, 2018, Debtor announced to Court on the record, OCSC 30-2017-00913985, C-33, Gallian sold the subject property. On November 9, 2018, Hon. James L. Crandall, C-33, Denied Gables HOA 30-2017-00913985, exparte MOT to freeze debtors equity from sale to bona fide purchaser Randall L. Nickel. "It's her equity." On December 6, 2018, Court vacated jury trial sua sponte.	UNKNOWN

35. Any financial assets you did not already list

☐ No

☒ Yes. Give specific information..

Possible COVID-19 Rent Relief Act from State of California for rent relief (Applied for June 2021, but not yet approved).
Not property of the estate. \$27,000.00

\$27,000.00

36. Add the dollar value of all of your entries from Part 4, including any entries for pages you have attached for Part 4. Write that number here.....

\$ 122,700.00

Part 5: Describe Any Business-Related Property You Own or Have an Interest In. List any real estate in Part 1.

37. Do you own or have any legal or equitable interest in any business-related property?

☒ No. Go to Part 6.

☐ Yes. Go to line 38.

Part 6: Describe Any Farm- and Commercial Fishing-Related Property You Own or Have an Interest In. If you own or have an interest in farmland, list it in Part 1.

46. Do you own or have any legal or equitable interest in any farm- or commercial fishing-related property?

☒ No. Go to Part 7.

☐ Yes. Go to line 47.

Part 7: Describe All Property You Own or Have an Interest in That You Did Not List Above

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Debtor 1 Jamie Lynn Gallian

Case number (if known) 8:21-bk-11710-ES

53. Do you have other property of any kind you did not already list?

Examples: Season tickets, country club membership

☒ No

☐ Yes. Give specific information.....

54. Add the dollar value of all of your entries from Part 7. Write that number here

\$0.00

Part 8: List the Totals of Each Part of this Form

55. Part 1: Total real estate, line 2		\$235,000.00
56. Part 2: Total vehicles, line 5	\$0.00	
57. Part 3: Total personal and household items, line 15	\$8,925.00	
58. Part 4: Total financial assets, line 36	\$122,700.00	
59. Part 5: Total business-related property, line 45	\$0.00	
60. Part 6: Total farm- and fishing-related property, line 52	\$0.00	
61. Part 7: Total other property not listed, line 54	\$0.00	
	+	
62. Total personal property. Add lines 56 through 61... ..	\$131,625.00	Copy personal property total \$131,625.00
63. Total of all property on Schedule A/B. Add line 55 + line 62		\$366,625.00

Fill in this information to identify your case:

Debtor 1	Jamie Lynn Gallian		
	First Name	Middle Name	Last Name
Debtor 2			
(Spouse if, filing)	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	CENTRAL DISTRICT OF CALIFORNIA--SANTA ANA DIVISION		
Case number	8:21-bk-11710-ES		
(if known)			

☐ Check if this is an amended filing

Official Form 106D

Schedule D: Creditors Who Have Claims Secured by Property

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, copy the Additional Page, fill it out, number the entries, and attach it to this form. On the top of any additional pages, write your name and case number (if known).

1. Do any creditors have claims secured by your property?

- ☐ No. Check this box and submit this form to the court with your other schedules. You have nothing else to report on this form.
- ☒ Yes. Fill in all of the information below.

Part 1: List All Secured Claims

2. List all secured claims. If a creditor has more than one secured claim, list the creditor separately for each claim. If more than one creditor has a particular claim, list the other creditors in Part 2. As much as possible, list the claims in alphabetical order according to the creditor's name.

		Column A Amount of claim Do not deduct the value of collateral.	Column B Value of collateral that supports this claim	Column C Unsecured portion if any
2.1	J-Pad, LLC, Steven & Brian Gallian; EJ Gallian; Justin Barclay; Ronald J. Pierpont; Robert J. Pierpont; Jamie Lynn Gallian <small>Creditor's Name</small>	Describe the property that secures the claim: 16222 Monterey Ln. Spc 376 Huntington Beach, CA 92649 Orange County APN: 891-569-62; 2014 Skyline Custom Villa Manufactured Home. Decal No. LBM1081. Serial Number AC7V710394GB 56"x15'2"; Serial Number AC7V710394GA 60"x15'2".	\$175,000.00	\$235,000.00
	21742 Anza Avenue Torrance, CA 90503 <small>Number, Street, City, State & Zip Code</small>	As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Nature of lien. Check all that apply. <input checked="" type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input type="checkbox"/> Judgment lien from a lawsuit <input type="checkbox"/> Other (including a right to offset)	Holder of UCC 1 Perfected 1/14/2019; HCD Registration Jamie Lynn Gallian perfected 2-25-2021	
Who owes the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim relates to a community debt				
Date debt was incurred		Last 4 digits of account number N/A		

Official Form 106D

Schedule D: Creditors Who Have Claims Secured by Property

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Best Case Bankruptcy

Debtor 1 **Jamie Lynn Gallian** Case number (if known) **8:21-bk-11710-ES**
First Name Middle Name Last Name

2.2 **Janine Jasso** Describe the property that secures the claim: **\$53,684.41** **\$235,000.00** **\$0.00**
Creditor's Name

16025 Warmington Lane
Huntington Beach, CA
92649

Number, Street, City, State & Zip Code

Who owes the debt? Check one.

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim relates to a community debt

Describe the property that secures the claim:

16222 Monterey Ln. Spc 376
Huntington Beach, CA 92649
Orange County
APN: 891-569-62; 2014 Skyline
Custom Villa Manufactured Home.
Decal No. LBM1081. Serial Number
AC7V710394GB 56'x15'2"; Serial
Number AC7V710394GA 60'x15'2".

As of the date you file, the claim is: Check all that apply.

- ☐ Contingent
☐ Unliquidated
☒ Disputed

Nature of lien. Check all that apply.

- ☐ An agreement you made (such as mortgage or secured car loan)
☐ Statutory lien (such as tax lien, mechanic's lien)
☒ Judgment lien from a lawsuit
☐ Other (including a right to offset)

Date debt was incurred **12/4/2018**

Last 4 digits of account number **HOA Fees 3985**

2.3 **Janine Jasso** Describe the property that secures the claim: **\$13,229.24** **\$235,000.00** **\$6,913.65**
Creditor's Name

16025 Warmington Lane
Huntington Beach, CA
92649

Number, Street, City, State & Zip Code

Who owes the debt? Check one.

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim relates to a community debt

Describe the property that secures the claim:

16222 Monterey Ln. Spc 376
Huntington Beach, CA 92649
Orange County
APN: 891-569-62; 2014 Skyline
Custom Villa Manufactured Home.
Decal No. LBM1081. Serial Number
AC7V710394GB 56'x15'2"; Serial
Number AC7V710394GA 60'x15'2".

As of the date you file, the claim is: Check all that apply.

- ☐ Contingent
☐ Unliquidated
☐ Disputed

Nature of lien. Check all that apply.

- ☐ An agreement you made (such as mortgage or secured car loan)
☐ Statutory lien (such as tax lien, mechanic's lien)
☐ Judgment lien from a lawsuit
☐ Other (including a right to offset)

Date debt was incurred **2018**

Last 4 digits of account number **Attorney Fees \$9400.00 Civil OCSC 30-2018-00986785.**

Add the dollar value of your entries in Column A on this page. Write that number here:
If this is the last page of your form, add the dollar value totals from all pages.
Write that number here:

\$241,913.65

\$241,913.65

Part 2: List Others to Be Notified for a Debt That You Already Listed

Use this page only if you have others to be notified about your bankruptcy for a debt that you already listed in Part 1. For example, if a collection agency is trying to collect from you for a debt you owe to someone else, list the creditor in Part 1, and then list the collection agency here. Similarly, if you have more than one creditor for any of the debts that you listed in Part 1, list the additional creditors here. If you do not have additional persons to be notified for any debts in Part 1, do not fill out or submit this page.

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Debtor 1 **Jamie Lynn Gallian** Case number (if known) **8:21-bk-11710-ES**
First Name Middle Name Last Name

[] Name, Number, Street, City, State & Zip Code On which line in Part 1 did you enter the creditor? **2.2; 2.3**
Janine Jasso. Esq.
16025 Warmington Lane Last 4 digits of account number _____
Huntington Beach, CA 92649

J-Pad, LLC On which line in Part 1 did you enter the creditor? **2.1**
21742 Anza Avenue Last 4 digits of account number _____
Torrance, CA 90503

EXHIBIT 5

Fill in this information to identify your case and this filing:

Debtor 1	Jamie Lynn Gallian		
	First Name	Middle Name	Last Name
Debtor 2 (Spouse, if filing)			
	First Name	Middle Name	Last Name
United States Bankruptcy Court for the: <u>CENTRAL DISTRICT OF CALIFORNIA</u>			
Case number	8:21-bk-11710-ES		

☐ Check if this is an amended filing

Official Form 106A/B
Schedule A/B: Property

12/15

In each category, separately list and describe items. List an asset only once. If an asset fits in more than one category, list the asset in the category where you think it fits best. Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Each Residence, Building, Land, or Other Real Estate You Own or Have an Interest In

1. Do you own or have any legal or equitable interest in any residence, building, land, or similar property?

☐ No. Go to Part 2.

☒ Yes. Where is the property?

**APN 178-011-16, Tract 10542, Unit 4,
Lot 376**

1.1

16222 Monterey Ln #376

Street address, if available, or other description

Huntington Beach CA 92649-0000

City State ZIP Code

Orange

County

What is the property? Check all that apply

☒ Single-family home

☐ Duplex or multi-unit building

☐ Condominium or cooperative

☒ Manufactured or mobile home

☐ Land

☐ Investment property

☐ Timeshare

☐ Other

Who has an interest in the property? Check one

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

Do not deduct secured claims or exemptions. Put the amount of any secured claims on *Schedule D: Creditors Who Have Claims Secured by Property*.

Current value of the entire property?

\$275,000.00

Current value of the portion you own?

\$275,000.00

Describe the nature of your ownership interest (such as fee simple, tenancy by the entireties, or a life estate), if known.

Fee simple

☐ Check if this is community property (see instructions)

Other information you wish to add about this item, such as local property

identification number: APN 891,569,62

Title/Registration through HCD; LBM 1081 to Debtor.

2. Add the dollar value of the portion you own for all of your entries from Part 1, including any entries for pages you have attached for Part 1. Write that number here.....=>

\$275,000.00

Part 2: Describe Your Vehicles

Do you own, lease, or have legal or equitable interest in any vehicles, whether they are registered or not? Include any vehicles you own that someone else drives. If you lease a vehicle, also report it on *Schedule G: Executory Contracts and Unexpired Leases*.

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Debtor 1 Jamie Lynn Gallian

Case number (if known) 8:21-bk-11710-ES

3. Cars, vans, trucks, tractors, sport utility vehicles, motorcycles

- ☐ No
☒ Yes

3.1 Make: Kia
Model: Sportage
Year: 2020
Approximate mileage: _____
Other information: _____

Location: 16222 Monterey Ln
#376, Huntington Beach CA
92649
(LEASE)

Who has an interest in the property? Check one

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another

☐ Check if this is community property
(see instructions)

Do not deduct secured claims or exemptions. Put
the amount of any secured claims on Schedule D:
Creditors Who Have Claims Secured by Property.

Current value of the
entire property?

\$0.00

Current value of the
portion you own?

\$0.00

4. Watercraft, aircraft, motor homes, ATVs and other recreational vehicles, other vehicles, and accessories
Examples: Boats, trailers, motors, personal watercraft, fishing vessels, snowmobiles, motorcycle accessories

- ☒ No
☐ Yes

5 Add the dollar value of the portion you own for all of your entries from Part 2, including any entries for
pages you have attached for Part 2. Write that number here.....=>

\$0.00

Part 3: Describe Your Personal and Household Items

Do you own or have any legal or equitable interest in any of the following items?

Current value of the
portion you own?
Do not deduct secured
claims or exemptions.

6. Household goods and furnishings

Example Major appliances, W/D, Refrigerator, living furniture, linens, china, kitchenware, beds, Sofa,
chairs, dressers, coffee table, end table, Stools, dining table, hutch, side table, curio cabinet, wall unit, desk.

- ☐ No
☒ Yes. Describe.....

Location: 16222 Monterey Ln #376, Huntington Beach CA 92649

\$3,500.00

Waterford crystal set red & white wine glasses

\$1,000.00

7. Electronics

Examples: Televisions and radios; audio, video, stereo, and digital equipment; computers, printers, scanners; music collections; electronic devices
including cell phones, cameras, media players, games

- ☒ Yes. Describe
☐ No..

Wall television, computer, printer, and peripherals

Location: 16222 Monterey Ln #376, Huntington Beach CA 92649

\$1,500.00

8. Collectibles of value

Examples: Antiques and figurines; paintings, prints, or other artwork; books, pictures, or other art objects; stamp, coin, or baseball card collections;
other collections, memorabilia, collectibles

- ☒ Yes. Describe
☐ No.

Lladro figurine boy dog collection (20)

Location: 16222 Monterey Ln #376, Huntington Beach CA 92649

\$1,950.00

9. Equipment for sports and hobbies

Examples: Sports, photographic, exercise, and other hobby equipment; bicycles, pool tables, golf clubs, skis; canoes and kayaks; carpentry tools;
musical instruments

- ☒ No
☐ Yes. Describe.....

10. Firearms

Examples: Pistols, rifles, shotguns, ammunition, and related equipment

- ☒ No
☐ Yes. Describe.....

Debtor 1 Jamie Lynn Gallian Case number (if known) 8:21-bk-11710-ES

11. Clothes

Examples: Everyday clothes, furs, leather coats, designer wear, shoes, accessories

☐ No

☒ Yes. Describe.....

Misc. clothing, winter jackets, purses, blouses, pants, dresses, uniforms,
shoes, boots, tennis shoes, sandals, heels, work shoes

Location: 16222 Monterey Ln #376, Huntington Beach CA 92649

\$1,000.00

12. Jewelry

Examples: Everyday jewelry, costume jewelry, engagement rings, wedding rings, heirloom jewelry, watches, gems, gold, silver

☒ Yes. Describe

Movado wrist watch (20 yrs old.), costume jewelry, misc non-gold chains,
bracelets and earrings.

\$1,000.00

☐ No.....

Location: 16222 Monterey Ln #376, Huntington Beach CA 92649

13. Non-farm animals

Examples: Dogs, cats, birds, horses

☒ Yes. Describe

5-year old Wired Terrier Dog

Location: 16222 Monterey Ln #376, Huntington Beach CA 92649

\$25.00

☐ No..

14. Any other personal and household items you did not already list, including any health aids you did not list

☐ No

☐ Yes. Give specific information.....

15. Add the dollar value of all of your entries from Part 3, including any entries for pages you have attached for Part 3. Write that number here

\$9,975.00

Part 4: Describe Your Financial Assets

Do you own or have any legal or equitable interest in any of the following?

Current value of the
portion you own?
Do not deduct secured
claims or exemptions.

16. Cash

Examples: Money you have in your wallet, in your home, in a safe deposit box, and on hand when you file your petition

☐ No

☐ Yes.....

17. Deposits of money

Examples: Checking, savings, or other financial accounts; certificates of deposit; shares in credit unions, brokerage houses, and other similar institutions. If you have multiple accounts with the same institution, list each.

☐ No

Institution name:

☒ Yes.....17.1

EDD Debit Card

Bank of America

\$3,793.00

17.2.

Checking and Savings

Alliant Credit Union Covid Relief Funds

\$1,407.00

17.3

Savings

Alliant Credit Union Covid Relief Funds

\$ 2,600.00.

18. Bonds, mutual funds, or publicly traded stocks

Examples: Bond funds, investment accounts with brokerage firms, money market accounts

☐ No

Institution or issuer name:

☐ Yes.

19. Non-publicly traded stock and interests in incorporated and unincorporated businesses, including an interest in an LLC, partnership, and joint venture

☐ No

Percentage of
Ownership

☒ Yes. Give specific information about them.....

Name of entity:

J-Sandcastle Co., LLC - Entity is debtor's single member LLC.

Note payable in the approximate amount of \$ 225,000.00, dated 11/16/2018,
secured by UCC-1, perfected 1/14/2019.

Entity currently has a bank account \$16,000, holding funds from tendered,
Lot 376, Tract 10542, Unit 4, rent checks payable to RDRMHE; Ground Space #376
for 2014 Skyline manufactured home, LBM1081. RDRMHE refused to
countersign Ground Space Agreement with Applicant. According to RDRMHE,
park rules forbid home to be held in name other than individual.

100 %

< \$209,000.00 >

However, RDRMHE allows registration held in the name of a Trust.

Official Form 106A/B

Schedule A/B: Property

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J-Pad, LLC - Entity is a manager-managed LLC.

Debtor has interest in LLC; J-Pad, LLC holds COT perfected with HCD.

Holder of UCC-1, perfected 1/14/2019, secured Note receivable \$225,000.00.

70 %

~~(\$175,000 & \$88,000.00 Less note \$225,000.00 = \$38,000.00. Promissory Note payable to Ron Pierpont; Robert McLelland vs equity in LLC + protection.~~

20. **Government and corporate bonds and other negotiable and non-negotiable instruments**
Negotiable instruments include personal checks, cashiers' checks, promissory notes, and money orders.
Non-negotiable instruments are those you cannot transfer to someone by signing or delivering them.

☒ No

☐ Yes. Give specific information about them

Issuer name:

21. **Retirement or pension accounts**

Examples: Interests in IRA, ERISA, Keogh, 401(k), 403(b), thrift savings accounts, or other pension or profit-sharing plans

☐ No

☒ Yes. List each account separately.

Type of account:

Institution name:

401k

Fidelity 401k

\$7,400.00

22. **Security deposits and prepayments**

Your share of all unused deposits you have made so that you may continue service or use from a company

Examples: Agreements with landlords, prepaid rent, public utilities (electric, gas, water), telecommunications companies, or others

☒ No

☐ Yes.

Institution name or individual:

23. **Annuities** (A contract for a periodic payment of money to you, either for life or for a number of years)

☒ No

☐ Yes. Issuer name and description.

24. **Interests in an education IRA, in an account in a qualified ABLE program, or under a qualified state tuition program.**

26 U.S.C. §§ 530(b)(1), 529A(b), and 529(b)(1).

☒ No

☐ Yes. Institution name and description. Separately file the records of any interests. 11 U.S.C. § 521(c);

25. **Trusts, equitable or future interests in property (other than anything listed in line 1), and rights or powers exercisable for your benefit**

☒ No

☐ Yes. Give specific information about them...

26. **Patents, copyrights, trademarks, trade secrets, and other intellectual property**

Examples: Internet domain names, websites, proceeds from royalties and licensing agreements

☒ No

☐ Yes. Give specific information about them...

27. **Licenses, franchises, and other general intangibles**

Examples: Building permits, exclusive licenses, cooperative association holdings, liquor licenses, professional licenses

☒ No

☐ Yes. Give specific information about them...

Money or property owed to you?

**Current value of the
portion you own?**
Do not deduct secured
claims or exemptions.

28. **Tax refunds owed to you**

☒ No

☐ Yes. Give specific information about them, including whether you already filed the returns and the tax years.....

29. **Family support**

Examples: Past due or lump sum alimony, spousal support, child support, maintenance, divorce settlement, property settlement

☒ No

Official Form 106A/B

Schedule A/B: Property

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☐ Yes. Give specific information.....

30. Other amounts someone owes you

Examples: Unpaid wages, disability insurance payments, disability benefits, sick pay, vacation pay, workers' compensation, Social Security benefits; unpaid loans you made to someone else

☒ No

☐ Yes. Give specific information..

31. Interests in insurance policies

Examples: Health, disability, or life insurance; health savings account (HSA); credit, homeowner's, or renter's insurance

☒ No

☐ Yes. Name the insurance company of each policy and list its value.
Company name:

Beneficiary:

Surrender or refund
value:

32. Any interest in property that is due you from someone who has died

If you are the beneficiary of a living trust, expect proceeds from a life insurance policy, or are currently entitled to receive property because someone has died.

☒ Yes....

Probate Estate Charles James Bradley Jr. DOD 6-18-2000. Case No. 30-2017-00915711.

unknown

☐ No..

Uncertain what, if any, proceeds will pass to debtor. Will placed in paper shredder by Administrator Sandra Bradley, decedent's widow. Witnessed first hand by decedent's brother & wife, David Bradley and Diane Goetz.

33. Claims against third parties, whether or not you have filed a lawsuit or made a demand for payment

est. \$ 100,000.00

Examples: Accidents, employment disputes, insurance claims, or rights to sue

☒ Yes. Describe each claim.....

Potential claim for wrongful termination claim against employer, United Airlines under Railroad Labor Act.

☐ No..

Potential claim against Association of Flight Attendants-MEC for failure to arbitrate employee's claim with CO.

34. Other contingent and unliquidated claims of every nature, including counterclaims of the debtor and rights to set off claims

☐ No

☒ Yes.. Describe each claim.....

34.1

Personal injury claim against Huntington Beach Gables Homeowner's Association and Jesus Jasso Jr.; DOI: 8/5/2018; Case No.: 30-2020-01153679

est. \$75,000.00

34.2

Potential Claim against Houser Bros Co dba Rancho Del Rey MHE for violation(s) of MRL §798, et seq multiple acts of retaliation, discrimination, trespassing, unlawful entry, forcible detainer, wrongful eviction, failure to timely pursue frivolous Unlawful detainer, forcible Detainer Action filed 1/2/19, against bona fide purchaser for value 11/1/2018. Potential Attorney fee award.

\$ 75,000.00

34.3

Possible rights to reversionary interest in unexpired 80 yr Ground Leasehold, Tract 10542, Lot 1 & 2, and Subcondominium Leasehold Unit 53.

unknown

34.4

Potential Victim Restitution Order in favor debtor for economic losses injury sustained from PC §242, 8/5/2018, against Jesus Jasso Jr.; OCDA filed Case No. 19WM09951, June 25, 2019

est. \$ 73,000.00

35. Any financial assets you did not already list

☒ Yes. Give specific information..

possible COVID-19 rent relief from State of California

est. \$ 27,000.00

☐ No.

(applied for, but not yet approved). Not property of the estate.

36. Add the dollar value of all of your entries from Part 4, including any entries for pages you have attached for Part 4. Write that number here.....

\$ 350,000.00

Part 5: Describe Any Business-Related Property You Own or Have an Interest In. List any real estate in Part 1.

37. Do you own or have any legal or equitable interest in any business-related property?

☒ No. Go to Part 6.

☐ Yes. Go to line 38.

Official Form 106A/B

Schedule A/B: Property

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Part 6: Describe Any Farm- and Commercial Fishing-Related Property You Own or Have an Interest In.
If you own or have an interest in farmland, list it in Part 1.

46. Do you own or have any legal or equitable interest in any farm- or commercial fishing-related property?

☒ No. Go to Part 7.

☐ Yes. Go to line 47.

Part 7: Describe All Property You Own or Have an Interest in That You Did Not List Above

53. Do you have other property of any kind you did not already list?

Examples: Season tickets, country club membership

☒ No

☐ Yes. Give specific information.....

54. Add the dollar value of all of your entries from Part 7. Write that number here

\$0.00

Part 8: List the Totals of Each Part of this Form

55. Part 1: Total real estate, line 2		<u>\$275,000.00</u>
56. Part 2: Total vehicles, line 5	<u>\$ 0.00</u>	
57. Part 3: Total personal and household items, line 15	<u>\$ 9,975.00</u>	
58. Part 4: Total financial assets, line 36	<u>\$ 350,000.00</u>	
59. Part 5: Total business-related property, line 45	<u>\$0.00</u>	
60. Part 6: Total farm- and fishing-related property, line 52	<u>\$0.00</u>	
61. Part 7: Total other property not listed, line 54	<u>+ \$0.00</u>	
62. Total personal property. Add lines 56 through 61...	<u>\$ 359,975.00</u>	Copy personal property total <u>\$359,975.00</u>
63. Total of all property on Schedule A/B. Add line 55 + line 62		<u>\$ 634,975.00</u>

Fill in this information to identify your case:

Debtor 1	<u>Jamie Lynn Gallian</u>		
	First Name	Middle Name	Last Name
Debtor 2			
(Spouse if, filing)	First Name	Middle Name	Last Name
United States Bankruptcy Court for the: <u>CENTRAL DISTRICT OF CALIFORNIA</u>			
Case number (if known)	<u>8:21-bk-11710-ES</u>		

☒ Check if this is an
amended filing

Official Form 106D

Schedule D: Creditors Who Have Claims Secured by Property

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, copy the Additional Page, fill it out, number the entries, and attach it to this form. On the top of any additional pages, write your name and case number (if known).

1. Do any creditors have claims secured by your property?

- ☐ No. Check this box and submit this form to the court with your other schedules. You have nothing else to report on this form.
☒ Yes. Fill in all of the information below.

Part 1: List All Secured Claims

2. List all secured claims. If a creditor has more than one secured claim, list the creditor separately for each claim. If more than one creditor has a particular claim, list the other creditors in Part 2. As much as possible, list the claims in alphabetical order according to the creditor's name.

	Column A Amount of claim Do not deduct the value of collateral.	Column B Value of collateral that supports this claim	Column C Unsecured portion if any
2.1 Houser Bros. Co. Creditor's Name DBA Rancho Del Rey Estates 16222 Monterey Ln. Huntington Beach, CA 92649 Number, Street, City, State & Zip Code	\$0.00	\$275,000.00	\$0.00
Describe the property that secures the claim: 16222 Monterey Ln #376 Huntington Beach, CA 92649 Orange County, LBM1081 HCD Title held by Debtor			
As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed			
Nature of lien. Check all that apply. <input type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input type="checkbox"/> Judgment lien from a lawsuit			
<input checked="" type="checkbox"/> Other (including a right to offset) Ground Lease, Lot 376, Tract 10542, Unit 4 located APN 178-011-01			
Who owes the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim relates to a community debt			
Date debt was incurred _____ Last 4 digits of account number _____			

Official Form 106D

Schedule D: Creditors Who Have Claims Secured by Property

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Debtor 1 **Jamie Lynn Gallian** Case number (if known) **8:21-bk-11710-ES**
First Name Middle Name Last Name

2.5 The Huntington Beach Gables Creditor's Name Homeowners Association c/o Epsten Grinnell & Howell, APC 10200 Willow Creek Road, Ste 100 San Diego, CA 92131 Number, Street, City, State & Zip Code	Describe the property that secures the claim: 16222 Monterey Ln #376 Huntington Beach, CA 92649 Orange County ; LBM1081; 2014 Skyline Manufactured Home APN 891-569-62 As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Nature of lien. Check all that apply. <input type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input checked="" type="checkbox"/> Judgment lien from a lawsuit <input checked="" type="checkbox"/> Other (including a right to offset) <u>5/16/2019 Abstract Judgment 2019 165259</u>	<u>\$319,653.59</u> <u>\$275,000.00</u> <u>\$319,653.59</u>
---	---	---

Who owes the debt? Check one.
☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim relates to a community debt

Date debt was incurred 5/16/2019 **Last 4 digits of account number** OCSC 30-2017-00913985

2.6 Huntington Beach Gables Homeowners Association Creditor's Name c/o Epsten Grinnell & Howell, APC 10200 Willow Creek Road, Ste 100 San Diego, CA 92131 Number, Street, City, State & Zip Code	Describe the property that secures the claim: 16222 Monterey Ln #376 Huntington Beach, CA 92649 Orange County; LBM 1081; 2014 Skyline Manufactured Home As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Nature of lien. Check all that apply. <input type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input checked="" type="checkbox"/> Judgment lien from a lawsuit <input checked="" type="checkbox"/> Other (including a right to offset) <u>Abstract Judgment 201900166068</u>	<u>\$319,653.59</u> <u>\$275,000.00</u> <u>\$319,653.59</u>
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Who owes the debt? Check one.
☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim relates to a community debt

Date debt was incurred 05/16/2019 **Last 4 digits of account number** OCSC 30-2017-00913985

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Debtor 1 <u>Jamie Lynn Gallian</u>		Case number (if known) <u>8:21-bk-11710-ES</u>	
<small>First Name Middle Name Last Name</small>			

<div>2.7</div> <div>The Huntington Beach Gables Homeowners Association c/o Epsten Grinnell & Howell, APC 10200 Willow Creek Road, Ste 100 San Diego, CA 92131</div> <div>Number, Street, City, State & Zip Code</div>	<div>Describe the property that secures the claim:</div> <div>16222 Monterey Ln #376 Huntington Beach, CA 92649 Orange County ; LBM1081; 2014 Skyline Manufactured Home APN 891-569-62</div> <div>As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed</div> <div>Nature of lien. Check all that apply. <input type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input checked="" type="checkbox"/> Judgment lien from a lawsuit</div> <div><input checked="" type="checkbox"/> Other (including a right to offset) <u>11/19/2018 Abstract Judgment 2018435011</u></div>	<div>\$3,070.00</div> <div>\$275,000.00</div> <div>\$3,070.00</div>
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Who owes the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim relates to a community debt	Date debt was incurred <u>11/19/2018</u>	Last 4 digits of account number <u>OCSC 30-2017-00913985</u>
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<div>2.8</div> <div>Huntington Beach Gables Homeowners Association c/o Epsten Grinnell & Howell, APC 10200 Willow Creek Road, Ste 100 San Diego, CA 92131</div> <div>Number, Street, City, State & Zip Code</div>	<div>Describe the property that secures the claim:</div> <div>16222 Monterey Ln #376 Huntington Beach, CA 92649 Orange County; LBM 1081; 2014 Skyline Manufactured Home; APN 891-569-62</div> <div>As of the date you file, the claim is: Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed</div> <div>Nature of lien. Check all that apply. <input type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input checked="" type="checkbox"/> Judgment lien from a lawsuit</div> <div><input checked="" type="checkbox"/> Other (including a right to offset) <u>Abstract Judgment 2019148568</u></div>	<div>\$9,265.00</div> <div>\$275,000.00</div> <div>\$9,265.00</div>
--	--	---

Who owes the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim relates to a community debt	Date debt was incurred <u>05/03/2019</u>	Last 4 digits of account number <u>OCSC 30-2017-00962999</u>
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Debtor 1 Jamie Lynn Gallian Case number (if known) 8:21-bk-11710-ES
First Name Middle Name Last Name

<div>2.9</div> <div>Janine Basso, ESQ Creditor's Name</div> <div>16025 Warmington Lane Huntington Beach, CA 92649 Number, Street, City, State & Zip Code</div> <div>Who owes the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim relates to a community debt</div>	<div>Describe the property that secures the claim: <u>\$13,229.24</u> <u>\$275,000.00</u> <u>\$13,229.24</u></div> <div>16222 Monterey Ln #376 Huntington Beach, CA 92649 Orange County ; LBM1081; 2014 Skyline Manufactured Home APN 891-569-62 As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input checked="" type="checkbox"/> Disputed Nature of lien. Check all that apply. <input type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input checked="" type="checkbox"/> Judgment lien from a lawsuit <input checked="" type="checkbox"/> Other (including a right to offset) <u>11/19/2018 Abstract Judgment 2021000348287</u></div> <div>Date debt was incurred <u>5/27/2021</u> Last 4 digits of account number <u>OCSC 30-2018-00986785</u></div>
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<div>2.10</div> <div>People of the ST of CA Creditor's Name</div> <div>8141 13th Street Westminister, CA 92683 Number, Street, City, State & Zip Code</div> <div>Who owes the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim relates to a community debt</div>	<div>Describe the property that secures the claim: <u>\$13,229.24</u> <u>\$275,000.00</u> <u>\$13,229.24</u></div> <div>16222 Monterey Ln #376 Huntington Beach, CA 92649 Orange County; LBM 1081; 2014 Skyline Manufactured Home; APN 891-569-62 As of the date you file, the claim is: Check all that apply <input type="checkbox"/> Contingent <input checked="" type="checkbox"/> Unliquidated <u>On Appeal 30-2021-01189657</u> <input type="checkbox"/> Disputed Nature of lien. Check all that apply. <input type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input checked="" type="checkbox"/> Judgment lien from a lawsuit <input checked="" type="checkbox"/> Other (including a right to offset) <u>Abstract Judgment 2021000348287</u></div> <div>Date debt was incurred <u>5/27/2021</u> Last 4 digits of account number <u>OCSC 18WM05278</u></div>
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Debtor 1 <u>Jamie Lynn Galian</u>		Case number (if known) <u>8:21-bk-11710-ES</u>	
<small>First Name Middle Name Last Name</small>			

2.11	Janine Basso, ESQ <small>Creditor's Name</small> 16025 Warmington Lane Huntinton Beach, CA 92649 <small>Number, Street, City, State & Zip Code</small>	Describe the property that secures the claim: <div style="border: 1px solid black; padding: 2px;">16222 Monterey Ln #376 Huntington Beach, CA 92649 Orange County ; LBM1081; 2014 Skyline Manufactured Home APN 891-569-62</div> As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input checked="" type="checkbox"/> Disputed Nature of lien. Check all that apply. <input type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input checked="" type="checkbox"/> Judgment lien from a lawsuit <input checked="" type="checkbox"/> Other (including a right to offset)	<u>\$ 53,684.41</u> <u>\$275,000.00</u> <u>\$53,684.41</u>
------	---	--	--

Who owes the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim relates to a community debt	Date debt was incurred <u>7/23/2020</u> Last 4 digits of account number <u>OCSC 30-2017-00913985</u>
--	--

2.12	Huntington Beach Gables Homeowners Association <small>Creditor's Name</small> c/o Epsten Grinnell & Howell, APC 10200 Willow Creek Road, Ste 100 San Diego, CA 92131 <small>Number, Street, City, State & Zip Code</small>	Describe the property that secures the claim: <div style="border: 1px solid black; padding: 2px;">16222 Monterey Ln #376 Huntington Beach, CA 92649 Orange County; LBM 1081; 2014 Skyline Manufactured Home; APN 891-569-62</div> As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Nature of lien. Check all that apply. <input type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input checked="" type="checkbox"/> Judgment lien from a lawsuit <input checked="" type="checkbox"/> Other (including a right to offset)	<u>\$46,138.00</u> <u>\$275,000.00</u> <u>\$46,138.00</u>
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Who owes the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim relates to a community debt	Date debt was incurred <u>12/14/2018</u> Last 4 digits of account number <u>OCSC 30-2017-00913985</u>
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Case 8:21-bk-11710-ES Doc 22 Filed 10/14/21 Entered 10/14/21 17:12:48 Desc
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Debtor 1 Jamie Lynn Gallian		Case number (if known) 8:21-bk-11710-ES	
<small>First Name Middle Name Last Name</small>			
2.7	The Huntington Beach Gables <small>Creditor's Name</small> Homeowners Association Gordon, Rees, Mansukhani 633 W 5th Street, 52nd Floor Los Angeles, CA 90071 <small>Number, Street, City, State & Zip Code</small>	Describe the property that secures the claim: 16222 Monterey Ln #376 Huntington Beach, CA 92649 Orange County; 2014 Skyline Manufactured Home LBM 1081 <small>As of the date you file, the claim is: Check all that apply.</small> <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Nature of lien. Check all that apply. <input type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input type="checkbox"/> Judgment lien from a lawsuit <input checked="" type="checkbox"/> Other (including a right to offset)	\$46,138.00 \$275,000.00 \$46,138.00
Who owes the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim relates to a community debt		Abstract of Judgement 2018000467142	
Date debt was incurred 12/14/2018		Last 4 digits of account number 30-2017-00913985	

Add the dollar value of your entries in Column A on this page. Write that number here:
If this is the last page of your form, add the dollar value totals from all pages.
Write that number here:

\$604,242.59
\$ 604,242.59

Part 2: List Others to Be Notified for a Debt That You Already Listed

Use this page only if you have others to be notified about your bankruptcy for a debt that you already listed in Part 1. For example, if a collection agency is trying to collect from you for a debt you owe to someone else, list the creditor in Part 1, and then list the collection agency here. Similarly, if you have more than one creditor for any of the debts that you listed in Part 1, list the additional creditors here. If you do not have additional persons to be notified for any debts in Part 1, do not fill out or submit this page.

EXHIBIT 6

Fill in this information to identify your case and this filing:

Debtor 1 Jamie Lynn Gallian
 First Name Middle Name Last Name

Debtor 2
 (Spouse, if filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: CENTRAL DISTRICT OF CALIFORNIA--SANTA ANA DIVISION

Case number 8:21-bk-11710-ES

☒ Check if this is an amended filing

Official Form 106A/B

Schedule A/B: Property

12/15

In each category, separately list and describe items. List an asset only once. If an asset fits in more than one category, list the asset in the category where you think it fits best. Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Each Residence, Building, Land, or Other Real Estate You Own or Have an Interest In

1. Do you own or have any legal or equitable interest in any residence, building, land, or similar property?

☐ No. Go to Part 2.

☒ Yes. Where is the property?

**Located on APN 178-011-01
Tract 10542, Unit 4, Lot 376**

1.1

16222 Monterey Ln. Spc 376

Street address, if available, or other description

Huntington Beach CA 92649-0000

City State ZIP Code

Orange

County

What is the property? Check all that apply

- ☒ Single-family home
- ☐ Duplex or multi-unit building
- ☐ Condominium or cooperative
- ☒ Manufactured or mobile home
- ☐ Land
- ☐ Investment property
- ☐ Timeshare
- ☐ Other

Who has an interest in the property? Check one

- ☒ Debtor 1 only
- ☐ Debtor 2 only
- ☐ Debtor 1 and Debtor 2 only
- ☐ At least one of the debtors and another

Other information you wish to add about this item, such as local property identification number:

APN: 891-569-62; 2014 Skyline Custom Villa Manufactured Home. Decal No. LBM1081. Serial Number AC7V710394GB 56'x15'2"; Serial Number AC7V710394GA 60'x15'2".

Do not deduct secured claims or exemptions. Put the amount of any secured claims on *Schedule D: Creditors Who Have Claims Secured by Property*.

Current value of the entire property?
\$235,000.00

Current value of the portion you own?
\$235,000.00

Describe the nature of your ownership interest (such as fee simple, tenancy by the entireties, or a life estate), if known.
Fee Simple

☐ Check if this is community property (see instructions)

2. Add the dollar value of the portion you own for all of your entries from Part 1, including any entries for pages you have attached for Part 1. Write that number here.....=>

\$235,000.00

Part 2: Describe Your Vehicles

Do you own, lease, or have legal or equitable interest in any vehicles, whether they are registered or not? Include any vehicles you own that someone else drives. If you lease a vehicle, also report it on *Schedule G: Executory Contracts and Unexpired Leases*.

Debtor 1 Jamie Lynn GallianCase number (if known) 8:21-bk-11710-ES

3. Cars, vans, trucks, tractors, sport utility vehicles, motorcycle

- ☒ Yes Lease 2020 Kia Sportage Expires 12/2022
- ☐ No

4. Watercraft, aircraft, motor homes, ATVs and other recreational vehicles, other vehicles, and accessories

Examples: Boats, trailers, motors, personal watercraft, fishing vessels, snowmobiles, motorcycle accessories

- ☒ No
- ☐ Yes

5 Add the dollar value of the portion you own for all of your entries from Part 2, including any entries for pages you have attached for Part 2. Write that number here.....=>

\$0.00**Part 3: Describe Your Personal and Household Items**

Do you own or have any legal or equitable interest in any of the following items?

Current value of the portion you own?
Do not deduct secured claims or exemptions.

6. Household goods and furnishings

Examples: Major appliances, furniture, linens, china, kitchenware

- ☐ No
- ☒ Yes. Describe.....

Misc. household goods and furnishings
Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649

\$3,500.00waterford crystal set red and white wine glasses\$1,000.00

7. Electronics

Examples: Televisions and radios; audio, video, stereo, and digital equipment; computers, printers, scanners; music collections; electronic devices including cell phones, cameras, media players, games

- ☐ No
- ☒ Yes. Describe.....

Wall television, computer, printer and peripherals
Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649

\$500.00

8. Collectibles of value

Examples: Antiques and figurines; paintings, prints, or other artwork; books, pictures, or other art objects; stamp, coin, or baseball card collections; other collections, memorabilia, collectibles

- ☐ No
- ☒ Yes. Describe..... Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649

Lladro figurine collection (20)\$1,900.00

9. Equipment for sports and hobbies

Examples: Sports, photographic, exercise, and other hobby equipment; bicycles, pool tables, golf clubs, skis; canoes and kayaks; carpentry tools; musical instruments

- ☒ No
- ☐ Yes. Describe.....

10. Firearms

Examples: Pistols, rifles, shotguns, ammunition, and related equipment

- ☒ No
- ☐ Yes. Describe.....

Debtor 1 Jamie Lynn GallianCase number (if known) 8:21-bk-11710-ES11. **Clothes***Examples:* Everyday clothes, furs, leather coats, designer wear, shoes, accessories☐ No☒ Yes. Describe.....**Misc. clothing****Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649****\$1,000.00**12. **Jewelry***Examples:* Everyday jewelry, costume jewelry, engagement rings, wedding rings, heirloom jewelry, watches, gems, gold, silver☐ No☒ Yes. Describe.....**Movado wrist watch (20 yrs. old); costume jewelry, misc. non-gold chains/bracelets, and earrings.****Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649****\$1,000.00**13. **Non-farm animals***Examples:* Dogs, cats, birds, horses☐ No☒ Yes. Describe.....**5-year old Wired Terrier Dog****\$25.00**14. **Any other personal and household items you did not already list, including any health aids you did not list**☒ No☐ Yes. Give specific information.....15. **Add the dollar value of all of your entries from Part 3, including any entries for pages you have attached for Part 3. Write that number here****\$8,925.00****Part 4: Describe Your Financial Assets****Do you own or have any legal or equitable interest in any of the following?****Current value of the portion you own?**
Do not deduct secured claims or exemptions.16. **Cash***Examples:* Money you have in your wallet, in your home, in a safe deposit box, and on hand when you file your petition☒ No☐ Yes.....17. **Deposits of money***Examples:* Checking, savings, or other financial accounts; certificates of deposit; shares in credit unions, brokerage houses, and other similar institutions. If you have multiple accounts with the same institution, list each.☐ No☒ Yes.....

Institution name:

17.1. **EDD Debit account Bank of America****\$3,793.00**17.2. **Savings****Alliant Credit Union--Only funds are Covid-19 relief funds from the government.****\$1,407.00**

Debtor 1 Jamie Lynn GallianCase number (if known) 8:21-bk-11710-ES

17.3. Savings	Alliant Credit Union--Only funds are Covid-19 relief funds from the government.	\$2,600.00
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18. Bonds, mutual funds, or publicly traded stocks

Examples: Bond funds, investment accounts with brokerage firms, money market accounts

☒ No☐ Yes..... Institution or issuer name:

19. Non-publicly traded stock and interests in incorporated and unincorporated businesses, including an interest in an LLC, partnership, and joint venture

☐ No☒ Yes. Give specific information about them.....

Name of entity:

% of ownership:

J-Sandcastle Co, LLC single member entity currently has a bank account of less than \$500.00 assets.

Original purpose of LLC was to hold HCD Registration to Debtor's residence. HCD Registration was transferred to debtor on 2/25/2021 after voluntary mediation with RDRMHE Park in UD Case. Park refused to countersign lease agreement with HCD Registered Applicant, J-Sandcastle Co LLC. According to Houser Bros RDR Park Owner/Manager, Park Rules allegedly forbid home to be held in name other than an individual; However, Park allow homes titled in a Trust. Debtor unable to verify stated reason in RDRMHE Park Rules.

100 %

\$ 500.00

J-PAD, LLC. Manager-Managed closed family LLC. Members Assets include bank account of around \$2,000; Uncashed B/A Cashiers Check \$13,710.00, from Chase J-Sandcastle 7/9/21, rent funds to RDRMHE; Rent Checks tendered for space 376 rent paid in full by debtor (Alliant CU Acct) through December 2021, returned from Rancho Del Rey MHE. J-Pad, LLC Holder of COTA perfected 1/14/2019. UCC-1 AD filed 1/14/2019, 30-yr. Manufactured Home Transaction secured by LBM1081, located on APN 178-011-16, Tract 10542, Unit 4, Lot 376. J-Pad, LLC Holder of Security Agreement, dated 11/16/18, Promissory Note (\$175,000 & \$88,000). Matures 2048. Various minimal debts owed approx, \$15,000. Debtor 341 testimony concerned frivolous costly ongoing litigation debt; Debtor manages 100%.

33-1/3 %

\$ 75,000.00

20. Government and corporate bonds and other negotiable and non-negotiable instruments

Negotiable instruments include personal checks, cashiers' checks, promissory notes, and money orders.

Non-negotiable instruments are those you cannot transfer to someone by signing or delivering them.

☒ No☐ Yes. Give specific information about them

Issuer name:

21. Retirement or pension accounts

Examples: Interests in IRA, ERISA, Keogh, 401(k), 403(b), thrift savings accounts, or other pension or profit-sharing plans

☐ No☒ Yes. List each account separately.

Type of account:

Institution name:

IRA

Fidelity

\$ 7,400.00

22. Security deposits and prepayments

Your share of all unused deposits you have made so that you may continue service or use from a company

Examples: Agreements with landlords, prepaid rent, public utilities (electric, gas, water), telecommunications companies, or others

☐ Yes☒ No.

Institution name or individual:

23. Annuities (A contract for a periodic payment of money to you, either for life or for a number of years)

☒ No☐ Yes..... Issuer name and description.

24. Interests in an education IRA, in an account in a qualified ABLE program, or under a qualified state tuition program.

26 U.S.C. §§ 530(b)(1), 529A(b), and 529(b)(1).

Official Form 106A/B

Schedule A/B: Property

page 4

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Best Case Bankruptcy

Debtor 1 Jamie Lynn GallianCase number (if known) 8:21-bk-11710-ES☐ No☐ Yes..... Institution name and description. Separately file the records of any interests.11 U.S.C. § 521(c):**25. Trusts, equitable or future interests in property (other than anything listed in line 1), and rights or powers exercisable for your benefit**☐ No☐ Yes. Give specific information about them...**26. Patents, copyrights, trademarks, trade secrets, and other intellectual property***Examples:* Internet domain names, websites, proceeds from royalties and licensing agreements☐ No☐ Yes. Give specific information about them...**27. Licenses, franchises, and other general intangibles***Examples:* Building permits, exclusive licenses, cooperative association holdings, liquor licenses, professional licenses☐ No☐ Yes. Give specific information about them...**Money or property owed to you?****Current value of the portion you own?**
Do not deduct secured claims or exemptions.**28. Tax refunds owed to you**☐ No☐ Yes. Give specific information about them, including whether you already filed the returns and the tax years.....**29. Family support***Examples:* Past due or lump sum alimony, spousal support, child support, maintenance, divorce settlement, property settlement☐ No☐ Yes. Give specific information.....**30. Other amounts someone owes you***Examples:* Unpaid wages, disability insurance payments, disability benefits, sick pay, vacation pay, workers' compensation, Social Security benefits; unpaid loans you made to someone else☐ No☐ Yes. Give specific information..**31. Interests in insurance policies***Examples:* Health, disability, or life insurance; health savings account (HSA); credit, homeowner's, or renter's insurance☐ No☐ Yes. Name the insurance company of each policy and list its value.

Company name:

Beneficiary:

Surrender or refund value:

32. Any interest in property that is due you from someone who has died

If you are the beneficiary of a living trust, expect proceeds from a life insurance policy, or are currently entitled to receive property because someone has died.

☐ No☐ Yes. Give specific information..**Probate estate of Charles J. Bradley, Jr. Case No. 30-2017-00915711.
Uncertain what, if any, proceeds will pass to debtor.****Creditor's claim Estate of Charles James Bradley Jr. filed by debtor for \$1 million, June 2020, denied by Administrator, Sandra Bradley, approx. March 29, 2021. Unknown whether any recovery will be awarded.****Unknown**

Debtor 1 Jamie Lynn GallianCase number (if known) 8:21-bk-11710-ES

33. Claims against third parties, whether or not you have filed a lawsuit or made a demand for payment

Examples: Accidents, employment disputes, insurance claims, or rights to sue

☒ Yes. Describe each claim.

Wrongful termination against United Airlines. No lawsuit filed.

☐ No.

Claim filed Collective Bargaining with Association of Flight Attendants under Railway Labor Act. Arbitration with Company & AFA requested and being pursued.

Unknown

34. Other contingent and unliquidated claims of every nature, including counterclaims of the debtor and rights to set off claims

☐ No☒ Yes. Describe each claim.....

34.1 Claim against Sandra Bradley and Houser Bros Co for failure to disclose real estate transaction May 2010, that ultimately lead to recordation of Grant Deed Doc # 2010219518 APN 937-63-053, Unit 53 in name of Houser Bros instead of intended transfer to Sandra L. Bradley Trust. No lawsuit filed yet.

Unknown

34.2 Possible claim against Sandra Bradley for failure to disclose previous alleged ARC violations in connection with improvements to Unit 53 in 2014, 2015, 2016, at Alderport, that occurred prior to debtor became legal owner of the Alderport property on March 23, 2017, the subject of 4/11/2017 FAC 5/16/2017, Gables HOA civil complaint.

Unknown

34.3 Multiple claims against Tract 10542 Master Lessor Houser Bros Co. and Park Manager Houser Bros Co. dba Rancho Del Rey Mobilehome Estates for Violation(s) Davis Stirling Act; Civil Code; violations of MRL §798, et seq. multiple acts (retaliation, discrimination, trespassing/unlawful entry; forcible detainer, wrongful eviction, failure to timely pursue/prosecute frivolous UD claim filed 1/2/19. Failure to counter sign Consumer Lease Agreement with Applicant(s); Registered Owners of bona fide purchase 2014 Skyline Custom Villa, LBM1081

Possible award of Attorney Fees under Davis Stirling Act; CA Civil Code; and (MRL)

Unknown

34.4 Personal Injury claim pending against Huntington Beach Gables HOA; Jesus Jasso, Jr. et al. Case No. 30-2020-01153679.

Estimated damages approximately \$195,000.

Unknown

34.5 Due to pending litigation Potential right of debtor to reversionary interest in Unit 53, unexpired Ground Leasehold and Subcondominium Leasehold in Condominium Project Lot 1 & 2, Tract 10542, APN 178-011-01; 178-011-16, Holding Alternate APN 178-771-03; Unit 53 APN 937-63-053; Original Master Lessor Houser Bros Co. and Robert P. Warmington, an Ind. Original Tenant; Robert P. Warmington, an Ind. Sublessor, assigned to Robert P. Warmington Company, Subleasee; Further assigned Declarant Robert P. Warmington Co. Sublessor assigned certain rights of Declarant to various consumers until 2059, termination 80-year Ground Leasehold and Subcondominium Leasehold; Further rights clarified by Master Lessor and Sublessor in First Amendment to CC&Rs filed OC Clerk Recorder, 8/5/1980, Doc No. 8005, detailing Consumer's Interest in Master Ground Leasehold and Subcondominium Leasehold relative to Lot 1 & 2 Tract 10542, City of Huntington Beach, CA.

(Huntington Beach Gables HOA has a filed cross-complaint pending OCSC, in which Gables HOA seek a voiding of the debtors sale of unencumbered rights in debtors previous residence; Ground Leasehold and Subcondominium Leasehold sold on 10/31/2018 to a bona fide purchaser for value, Randall Nickels, including rights of Assignment of unexpired term of 80 yr Ground Leasehold and Subcondominium Leasehold from Debtor to purchaser Randall Nickels).

Unknown

34.6 Potential Victim restitution Order from Defendant Jesus Jasso, Jr, OCSC Case No. 19WM09951
Approx. economic damages \$ 73,000.00

Unknown

35. Any financial assets you did not already list

☐ No☒ Yes. Give specific information..

CA COVID-19 relief from State of California for rent relief (debtor applied approx June 9,2021. CA Covid-19 Relief Award October 27, 2021. Not property of the estate.

\$24,301.55

36. Add the dollar value of all of your entries from Part 4, including any entries for pages you have attached for Part 4. Write that number here.....

\$ 115,001.55

Part 5: Describe Any Business-Related Property You Own or Have an Interest In. List any real estate in Part 1.

Debtor 1 Jamie Lynn GallianCase number (if known) 8:21-bk-11710-ES

37. Do you own or have any legal or equitable interest in any business-related property?

- ☒ No. Go to Part 6.
- ☐ Yes. Go to line 38.

Part 6: Describe Any Farm- and Commercial Fishing-Related Property You Own or Have an Interest In.
If you own or have an interest in farmland, list it in Part 1.

46. Do you own or have any legal or equitable interest in any farm- or commercial fishing-related property?

- ☒ No. Go to Part 7.
- ☐ Yes. Go to line 47.

Part 7: Describe All Property You Own or Have an Interest in That You Did Not List Above

53. Do you have other property of any kind you did not already list?

Examples: Season tickets, country club membership

- ☒ No
- ☐ Yes. Give specific information.....

54. Add the dollar value of all of your entries from Part 7. Write that number here

\$0.00**Part 8: List the Totals of Each Part of this Form**

55. Part 1: Total real estate, line 2		<u>\$235,000.00</u>
56. Part 2: Total vehicles, line 5	<u>\$0.00</u>	
57. Part 3: Total personal and household items, line 15	<u>\$8,925.00</u>	
58. Part 4: Total financial assets, line 36	<u>\$115,001.55</u>	
59. Part 5: Total business-related property, line 45	<u>\$0.00</u>	
60. Part 6: Total farm- and fishing-related property, line 52	<u>\$0.00</u>	
61. Part 7: Total other property not listed, line 54	+ <u>\$0.00</u>	
62. Total personal property. Add lines 56 through 61...	<u>\$123,926.55</u>	Copy personal property total <u>\$123,926.55</u>
63. Total of all property on Schedule A/B. Add line 55 + line 62		<u>\$358,926.55</u>

EXHIBIT 7

Fill in this information to identify your case and this filing:

Debtor 1 Jamie Lynn Gallian
 First Name Middle Name Last Name

Debtor 2
 (Spouse, if filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: CENTRAL DISTRICT OF CALIFORNIA--SANTA ANA DIVISION

Case number 8:21-bk-11710-ES

☒ Check if this is an amended filing

Official Form 106A/B

Schedule A/B: Property

12/15

In each category, separately list and describe items. List an asset only once. If an asset fits in more than one category, list the asset in the category where you think it fits best. Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Each Residence, Building, Land, or Other Real Estate You Own or Have an Interest In**1. Do you own or have any legal or equitable interest in any residence, building, land, or similar property?**

- ☐ No. Go to Part 2.
- ☒ Yes. Where is the property?

**Located on APN 178-011-01
Tract 10542, Unit 4, Lot 376**

1.1

16222 Monterey Ln. Spc 376

Street address, if available, or other description

Huntington Beach CA 92649-0000

City State ZIP Code

Orange

County

What is the property? Check all that apply

- ☒ Single-family home
- ☐ Duplex or multi-unit building
- ☐ Condominium or cooperative
- ☒ Manufactured or mobile home
- ☐ Land
- ☐ Investment property
- ☐ Timeshare
- ☐ Other

Who has an interest in the property? Check one

- ☒ Debtor 1 only
- ☐ Debtor 2 only
- ☐ Debtor 1 and Debtor 2 only
- ☐ At least one of the debtors and another

Do not deduct secured claims or exemptions. Put the amount of any secured claims on *Schedule D: Creditors Who Have Claims Secured by Property*.

Current value of the entire property?
\$235,000.00

Current value of the portion you own?
\$235,000.00

Describe the nature of your ownership interest (such as fee simple, tenancy by the entireties, or a life estate), if known. **80 yr Ground Leasehold, APN 178-011-01, Tract 10542, Unit 4, Lot 376. OC Clk Rec. RS Bk 58 pg 35-36; Parcel Map, Bk 108 Pg 47, 48; MM Bk 456, Pg 49-50;**

☐ Check if this is community property (see instructions)

Other information you wish to add about this item, such as local property identification number:

APN: 891-569-62; 2014 Skyline Custom Villa Manufactured Home.

HCD Decal No. LBM 1081. Serial Number AC7V710394GB/GA 56'x15'2".

Registered to Debtor. HCD COTA perfected 1/14/2019

2. Add the dollar value of the portion you own for all of your entries from Part 1, including any entries for pages you have attached for Part 1. Write that number here.....=>

\$235,000.00

Part 2: Describe Your Vehicles

Do you own, lease, or have legal or equitable interest in any vehicles, whether they are registered or not? Include any vehicles you own that someone else drives. If you lease a vehicle, also report it on *Schedule G: Executory Contracts and Unexpired Leases*.

Debtor 1 Jamie Lynn Gallian

Case number (if known) 8:21-bk-11710-ES

3. Cars, vans, trucks, tractors, sport utility vehicles, motorcycle

- ☒ Yes Lease 2020 Kia Sportage Expires 12/2022
☐ No

4. Watercraft, aircraft, motor homes, ATVs and other recreational vehicles, other vehicles, and accessories

Examples: Boats, trailers, motors, personal watercraft, fishing vessels, snowmobiles, motorcycle accessories

- ☒ No
☐ Yes

5 Add the dollar value of the portion you own for all of your entries from Part 2, including any entries for pages you have attached for Part 2. Write that number here.....=>

\$0.00

Part 3: Describe Your Personal and Household Items

Do you own or have any legal or equitable interest in any of the following items?

Current value of the portion you own?
Do not deduct secured claims or exemptions.

6. Household goods and furnishings

Examples: Major appliances, furniture, linens, china, kitchenware

- ☐ No
☒ Yes. Describe.....

Misc. household goods and furnishings
Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649

\$3,500.00

waterford crystal set red and white wine glasses

\$1,000.00

7. Electronics

Examples: Televisions and radios; audio, video, stereo, and digital equipment; computers, printers, scanners; music collections; electronic devices including cell phones, cameras, media players, games

- ☐ No
☒ Yes. Describe.....

Wall television, computer, printer and peripherals
Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649

\$500.00

8. Collectibles of value

Examples: Antiques and figurines; paintings, prints, or other artwork; books, pictures, or other art objects; stamp, coin, or baseball card collections; other collections, memorabilia, collectibles

- ☐ No
☒ Yes. Describe..... Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649

Lladro figurine collection (20)

\$1,900.00

9. Equipment for sports and hobbies

Examples: Sports, photographic, exercise, and other hobby equipment; bicycles, pool tables, golf clubs, skis; canoes and kayaks; carpentry tools; musical instruments

- ☒ No
☐ Yes. Describe.....

10. Firearms

Examples: Pistols, rifles, shotguns, ammunition, and related equipment

- ☒ No
☐ Yes. Describe.....

Debtor 1 Jamie Lynn GallianCase number (if known) 8:21-bk-11710-ES11. **Clothes***Examples:* Everyday clothes, furs, leather coats, designer wear, shoes, accessories☐ No☒ Yes. Describe.....

Misc. clothing
 Location: 16222 Monterey Lane, Space 376, Huntington Beach CA
 92649

\$1,000.0012. **Jewelry***Examples:* Everyday jewelry, costume jewelry, engagement rings, wedding rings, heirloom jewelry, watches, gems, gold, silver☐ No☒ Yes. Describe.....

Movado wrist watch (20 yrs. old); costume jewelry, misc. non-gold
 chains/bracelets, and earrings.
 Location: 16222 Monterey Lane, Space 376, Huntington Beach CA
 92649

\$1,000.0013. **Non-farm animals***Examples:* Dogs, cats, birds, horses☐ No☒ Yes. Describe.....5-year old Wired Terrier Dog\$25.0014. **Any other personal and household items you did not already list, including any health aids you did not list**☒ No☐ Yes. Give specific information.....15. **Add the dollar value of all of your entries from Part 3, including any entries for pages you have attached for Part 3. Write that number here**\$8,925.00**Part 4: Describe Your Financial Assets****Do you own or have any legal or equitable interest in any of the following?**

**Current value of the
 portion you own?**
 Do not deduct secured
 claims or exemptions.

16. **Cash***Examples:* Money you have in your wallet, in your home, in a safe deposit box, and on hand when you file your petition☒ No☐ Yes.....17. **Deposits of money***Examples:* Checking, savings, or other financial accounts; certificates of deposit; shares in credit unions, brokerage houses, and other similar institutions. If you have multiple accounts with the same institution, list each.☐ No☒ Yes.....

Institution name:

17.1. **EDD Debit account** Bank of America\$3,793.0017.2. **Savings**Alliant Credit Union--Only funds are Covid-19
 relief funds from the government.\$1,407.00

Debtor 1 Jamie Lynn Gallian

Case number (if known) 8:21-bk-11710-ES

	Alliant Credit Union--Only funds are Covid-19 relief funds from the government.	\$2,600.00
--	--	-------------------

18. **Bonds, mutual funds, or publicly traded stocks**

Examples: Bond funds, investment accounts with brokerage firms, money market accounts

- ☒ No
☐ Yes..... Institution or issuer name:

19. **Non-publicly traded stock and interests in incorporated and unincorporated businesses, including an interest in an LLC, partnership, and joint venture**

- ☐ No
☒ Yes. Give specific information about them.....
Name of entity: % of ownership:

J-Sandcastle Co, LLC single member entity had a bank account of \$9000.00 assets to B/A

Cashiers Chk. Uncashed space 376 rent funds. Current less than \$500.00

Original purpose of LLC was to hold HCD Registration to Debtor's residence.

HCD Registration was transferred to debtor on 2/25/2021 after voluntary

mediation with RDRMHE Park re: 2019 UD Case. Park refused to countersign

lease agreement with HCD Registered Applicant, J-Sandcastle Co LLC. Accord-

ing to Houser Bros Park Owner/Manager, Park Rules allegedly forbid home

to be held in business name; insistent only in an individual name. However, Park allows

homes held in Trust. Debtor unable to verify stated reason in RDRMHE Park Rules.

100 % \$500.00

J-PAD, LLC. Manager-Managed LLC. Assets include bank account of less than \$1,000;

B/A Cashier;s Check approx, \$13,710.00, from 7/9/21 Chase Bank- J-Sandcastle Co LLC;

Rent Checks tendered for space 376 as agreed. Space rent tendered each month since filing

BK petition 7-9-21 by debtor (Alliant CU Acct.) through December 31, 2021, Concurrently

with CA Covid-19 Relief AWARD 10/27/2021; Houser Bros Co. caused further harm to

debtor, Houser Bros sent uncashed checks to various un-authorized entities including the

IRS, in violation of debtors STAY.

Debtors J-Pad, LLC, Holder of COTA perfected 1/14/2019.

100 % \$14,710.00

20. **Government and corporate bonds and other negotiable and non-negotiable instruments**

Negotiable instruments include personal checks, cashiers' checks, promissory notes, and money orders.

Non-negotiable instruments are those you cannot transfer to someone by signing or delivering them.

- ☒ No
☐ Yes. Give specific information about them
Issuer name:

21. **Retirement or pension accounts**

Examples: Interests in IRA, ERISA, Keogh, 401(k), 403(b), thrift savings accounts, or other pension or profit-sharing plans

- ☐ No
☒ Yes. List each account separately.
Type of account: Institution name:

IRA

Fidelity

\$ 7,400.00

22. **Security deposits and prepayments**

Your share of all unused deposits you have made so that you may continue service or use from a company

Examples: Agreements with landlords, prepaid rent, public utilities (electric, gas, water), telecommunications companies, or others

- ☐ Yes
☒ No. . Institution name or individual:

23. **Annuities** (A contract for a periodic payment of money to you, either for life or for a number of years)

- ☒ No
☐ Yes..... Issuer name and description.

24. **Interests in an education IRA, in an account in a qualified ABLE program, or under a qualified state tuition program.**

26 U.S.C. §§ 530(b)(1), 529A(b), and 529(b)(1).

Official Form 106A/B

Schedule A/B: Property

page 4

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Best Case Bankruptcy

Debtor 1 Jamie Lynn GallianCase number (if known) 8:21-bk-11710-ES☐ No☐ Yes..... Institution name and description. Separately file the records of any interests.11 U.S.C. § 521(c):**25. Trusts, equitable or future interests in property (other than anything listed in line 1), and rights or powers exercisable for your benefit**☐ No☐ Yes. Give specific information about them...**26. Patents, copyrights, trademarks, trade secrets, and other intellectual property***Examples:* Internet domain names, websites, proceeds from royalties and licensing agreements☐ No☐ Yes. Give specific information about them...**27. Licenses, franchises, and other general intangibles***Examples:* Building permits, exclusive licenses, cooperative association holdings, liquor licenses, professional licenses☐ No☐ Yes. Give specific information about them...**Money or property owed to you?****Current value of the portion you own?**
Do not deduct secured claims or exemptions.**28. Tax refunds owed to you**☐ No☐ Yes. Give specific information about them, including whether you already filed the returns and the tax years.....**29. Family support***Examples:* Past due or lump sum alimony, spousal support, child support, maintenance, divorce settlement, property settlement☐ No☐ Yes. Give specific information.....**30. Other amounts someone owes you***Examples:* Unpaid wages, disability insurance payments, disability benefits, sick pay, vacation pay, workers' compensation, Social Security benefits; unpaid loans you made to someone else☐ No☐ Yes. Give specific information..**31. Interests in insurance policies***Examples:* Health, disability, or life insurance; health savings account (HSA); credit, homeowner's, or renter's insurance☐ No☐ Yes. Name the insurance company of each policy and list its value.

Company name:

Beneficiary:

Surrender or refund value:

32. Any interest in property that is due you from someone who has died

If you are the beneficiary of a living trust, expect proceeds from a life insurance policy, or are currently entitled to receive property because someone has died.

☐ No☐ Yes. Give specific information..**Probate estate of Charles J. Bradley, Jr. Case No. 30-2017-00915711.
Uncertain what, if any, proceeds will pass to debtor.****Creditor's claim Estate of Charles James Bradley Jr. filed by debtor for \$1 million, June 2020, denied by Administrator, Sandra Bradley, approx. March 29, 2021. Unknown whether any recovery will be awarded.****Unknown**

Debtor 1 Jamie Lynn Gallian

Case number (if known) 8:21-bk-11710-ES

33. Claims against third parties, whether or not you have filed a lawsuit or made a demand for payment

Examples: Accidents, employment disputes, insurance claims, or rights to sue

☒ Yes. Describe each claim.

Wrongful termination against United Airlines. No lawsuit filed.

☐ No.

Claim filed Collective Bargaining with Association of Flight Attendants under
Railway Labor Act. Arbitration with Company & AFA requested and being pursued.

Unknown

34. Other contingent and unliquidated claims of every nature, including counterclaims of the debtor and rights to set off claims

☐ No

☒ Yes. Describe each claim.....

34.1 Claim against Sandra Bradley and Houser Bros Co for failure to disclose real estate transaction May 2010, that ultimately lead to recordation of Grant Deed Doc # 2010219518 APN 937-63-053, Unit 53 in name of Houser Bros instead of intended transfer to Sandra L. Bradley Trust. No lawsuit filed yet.

Unknown

34.2 Possible claim against Sandra Bradley for failure to disclose previous alleged ARC violations in connection with improvements to Unit 53 in 2014, 2015, 2016, at Alderport, that occurred prior to debtor became legal owner of the Alderport property on March 23, 2017, the subject of 4/11/2017 FAC 5/16/2017, Gables HOA civil complaint.

Unknown

34.3 Multiple claims against Tract 10542 Master Lessor Houser Bros Co. and Park Manager Houser Bros Co. dba Rancho Del Rey Mobilehome Estates for Violation(s) Davis Stirling Act; Civil Code; violations of MRL §798, et seq. multiple acts (retaliation, discrimination, trespassing/unlawful entry; forcible detainer, wrongful eviction, failure to timely pursue/prosecute frivolous UD claim filed 1/2/19. Failure to counter sign Consumer Lease Agreement with Applicant(s); Registered Owners of bona fide purchase 2014 Skyline Custom Villa, LBM1081

Possible award of Attorney Fees under Davis Stirling Act; CA Civil Code; and (MRL)

Unknown

34.4 Personal Injury claim pending against Huntington Beach Gables HOA; Jesus Jasso, Jr. et al. Case No. 30-2020-01153679.

Estimated damages approximately \$195,000.

Unknown

34.5 Due to pending litigation potential right of debtor to reversionary interest unexpired Ground Leasehold in Condominium Project Lot 1 & 2, Tract 10542, APN 178-011-01; 178-011-16, Holding Alternate APN 178-771-03;

Original Master Lessor Houser Bros Co. and Robert P. Warmington, an Ind. Original Tenant; Robert P. Warmington, an Ind. Sublessor, assigned to Robert P. Warmington Company, Subleasee; Further assigned Declarant Robert P. Warmington Co. Sublessor assigned certain rights of the Declarant to various consumers until 2059, an 80-year Ground Leasehold and Subcondominium Leasehold Tract 10542, Lot 1 and 2; Further rights clarified by Master Lessor and Sublessor in that certain First Amendment to CC&Rs filed OC Clerk Recorder, 8/5/1980, Doc No. 8005, detailing Consumer's Interest in Master Ground-Leasehold and Subcondominium Leasehold relative to Lot 1 & 2 Tract 10542 Hunt. Beach.

(Huntington Beach Gables HOA has filed a cross-complaint pending OCSC, in which Gables HOA seek a voiding of the debtors sale of unencumbered fee interest in debtor's previous residence; Ground Leasehold and Subcondominium Leasehold sold on 10/31/2018 to a bona fide purchaser for value, Randall Nickels, including rights of Assignment of unexpired term of 80 yr Ground Leasehold and Subcondominium Leasehold from Debtor to purchaser Randall Nickels).

Unknown

34.6 Potential Victim Restitution Order from Defendant Jesus Jasso, Jr, PC§242 OCSC Case No. 19WM09951
Approx. economic damages \$ 73,000.00

Unknown

35. Any financial assets you did not already list

☐ No

☒ Yes. Give specific information..

CA COVID-19 Award - State of California. Landlord refused to participate or apply on behalf of this tenant after receiving Tenants Declaration re: Covid related afflictions from Tenant. Tenant applied 6/9/21 and was Awarded Relief on 10/27/2021.

\$24,301.55

Landlord waited three weeks to notify Counsel in UD case of funds received. Landlord refused to dismiss UD case. Application to avoid Lease Forfeiture Filed @ CJC.

36. Add the dollar value of all of your entries from Part 4, including any entries for pages you have attached for Part 4. Write that number here.....

\$ 54,711.55

Part 5: Describe Any Business-Related Property You Own or Have an Interest In. List any real estate in Part 1.

Debtor 1 Jamie Lynn GallianCase number (if known) 8:21-bk-11710-ES

37. Do you own or have any legal or equitable interest in any business-related property?

- ☒ No. Go to Part 6.
- ☐ Yes. Go to line 38.

Part 6: Describe Any Farm- and Commercial Fishing-Related Property You Own or Have an Interest In.
If you own or have an interest in farmland, list it in Part 1.

46. Do you own or have any legal or equitable interest in any farm- or commercial fishing-related property?

- ☒ No. Go to Part 7.
- ☐ Yes. Go to line 47.

Part 7: Describe All Property You Own or Have an Interest in That You Did Not List Above

53. Do you have other property of any kind you did not already list?

Examples: Season tickets, country club membership

- ☒ No
- ☐ Yes. Give specific information.....

54. Add the dollar value of all of your entries from Part 7. Write that number here

\$0.00

Part 8: List the Totals of Each Part of this Form

55. Part 1: Total real estate, line 2		<u>\$235,000.00</u>
56. Part 2: Total vehicles, line 5	<u>\$0.00</u>	
57. Part 3: Total personal and household items, line 15	<u>\$8,925.00</u>	
58. Part 4: Total financial assets, line 36	<u>\$54,711.55</u>	
59. Part 5: Total business-related property, line 45	<u>\$0.00</u>	
60. Part 6: Total farm- and fishing-related property, line 52	<u>\$0.00</u>	
61. Part 7: Total other property not listed, line 54	<u>\$0.00</u>	
	+	
62. Total personal property. Add lines 56 through 61...	<u>\$63,636.55</u>	Copy personal property total <u>\$63,636.55</u>
63. Total of all property on Schedule A/B. Add line 55 + line 62		<u>\$298,636.55</u>

EXHIBIT 8

Fill in this information to identify your case and this filing:

Debtor 1 Jamie Lynn Gallian
 First Name Middle Name Last Name

Debtor 2
 (Spouse, if filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: CENTRAL DISTRICT OF CALIFORNIA--SANTA ANA DIVISION

Case number 8:21-bk-11710-ES

☒ Check if this is an amended filing

Official Form 106A/B

Schedule A/B: Property

12/15

In each category, separately list and describe items. List an asset only once. If an asset fits in more than one category, list the asset in the category where you think it fits best. Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Each Residence, Building, Land, or Other Real Estate You Own or Have an Interest In

1. Do you own or have any legal or equitable interest in any residence, building, land, or similar property?

- ☐ No. Go to Part 2.
- ☒ Yes. Where is the property?

**Located on APN 178-011-01
Tract 10542, Unit 4, Lot 376**

1.1

16222 Monterey Ln. Spc 376

Street address, if available, or other description

Huntington Beach CA 92649-0000

City State ZIP Code

Orange

County

What is the property? Check all that apply

- ☒ Single-family home
- ☐ Duplex or multi-unit building
- ☐ Condominium or cooperative
- ☒ Manufactured or mobile home
- ☐ Land
- ☐ Investment property
- ☐ Timeshare
- ☐ Other

Who has an interest in the property? Check one

- ☒ Debtor 1 only
- ☐ Debtor 2 only
- ☐ Debtor 1 and Debtor 2 only
- ☐ At least one of the debtors and another

Do not deduct secured claims or exemptions. Put the amount of any secured claims on *Schedule D: Creditors Who Have Claims Secured by Property*.

Current value of the entire property?

\$235,000.00

Current value of the portion you own?

\$235,000.00

Describe the nature of your ownership interest (such as fee simple, tenancy by the entireties, or a life estate), if known. **80 yr Ground Leasehold, APN 178-011-01, Tract 10542, Unit 4, Lot 376. OC Clk Rec. RS Bk 58 pg 35-36; Parcel Map, Bk 108 Pg 47, 48; MM Bk 456, Pg 49-50;**

☐ Check if this is community property (see instructions)

Other information you wish to add about this item, such as local property identification number:

APN: 891-569-62; 2014 Skyline Custom Villa Manufactured Home.**HCD Decal No. LBM 1081. Serial Number AC7V710394GB/GA 56'x15'2".****Registered to Debtor. HCD COTA perfected 1/14/2019**

2. Add the dollar value of the portion you own for all of your entries from Part 1, including any entries for pages you have attached for Part 1. Write that number here.....=>

\$235,000.00**Part 2: Describe Your Vehicles**

Do you own, lease, or have legal or equitable interest in any vehicles, whether they are registered or not? Include any vehicles you own that someone else drives. If you lease a vehicle, also report it on *Schedule G: Executory Contracts and Unexpired Leases*.

Debtor 1 Jamie Lynn GallianCase number (if known) 8:21-bk-11710-ES

3. Cars, vans, trucks, tractors, sport utility vehicles, motorcycle

- ☒ Yes Lease 2020 Kia Sportage Expires 12/2022
- ☐ No

4. Watercraft, aircraft, motor homes, ATVs and other recreational vehicles, other vehicles, and accessories

Examples: Boats, trailers, motors, personal watercraft, fishing vessels, snowmobiles, motorcycle accessories

- ☒ No
- ☐ Yes

5 Add the dollar value of the portion you own for all of your entries from Part 2, including any entries for pages you have attached for Part 2. Write that number here.....=>

\$0.00**Part 3: Describe Your Personal and Household Items**

Do you own or have any legal or equitable interest in any of the following items?

Current value of the portion you own?
Do not deduct secured claims or exemptions.

6. Household goods and furnishings

Examples: Major appliances, furniture, linens, china, kitchenware

- ☐ No
- ☒ Yes. Describe.....

Misc. household goods and furnishings
Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649

\$3,500.00waterford crystal set red and white wine glasses\$1,000.00

7. Electronics

Examples: Televisions and radios; audio, video, stereo, and digital equipment; computers, printers, scanners; music collections; electronic devices including cell phones, cameras, media players, games

- ☐ No
- ☒ Yes. Describe.....

Wall television, computer, printer and peripherals
Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649

\$500.00

8. Collectibles of value

Examples: Antiques and figurines; paintings, prints, or other artwork; books, pictures, or other art objects; stamp, coin, or baseball card collections; other collections, memorabilia, collectibles

- ☐ No
- ☒ Yes. Describe..... Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649

Lladro figurine collection (20)\$1,900.00

9. Equipment for sports and hobbies

Examples: Sports, photographic, exercise, and other hobby equipment; bicycles, pool tables, golf clubs, skis; canoes and kayaks; carpentry tools; musical instruments

- ☒ No
- ☐ Yes. Describe.....

10. Firearms

Examples: Pistols, rifles, shotguns, ammunition, and related equipment

- ☒ No
- ☐ Yes. Describe.....

Debtor 1 Jamie Lynn GallianCase number (if known) 8:21-bk-11710-ES11. **Clothes***Examples:* Everyday clothes, furs, leather coats, designer wear, shoes, accessories☐ No☒ Yes. Describe.....

Misc. clothing
 Location: 16222 Monterey Lane, Space 376, Huntington Beach CA
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\$1,000.0012. **Jewelry***Examples:* Everyday jewelry, costume jewelry, engagement rings, wedding rings, heirloom jewelry, watches, gems, gold, silver☐ No☒ Yes. Describe.....

Movado wrist watch (20 yrs. old); costume jewelry, misc. non-gold
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 Location: 16222 Monterey Lane, Space 376, Huntington Beach CA
 92649

\$1,000.0013. **Non-farm animals***Examples:* Dogs, cats, birds, horses☐ No☒ Yes. Describe.....5-year old Wired Terrier Dog\$25.0014. **Any other personal and household items you did not already list, including any health aids you did not list**☒ No☐ Yes. Give specific information.....15. **Add the dollar value of all of your entries from Part 3, including any entries for pages you have attached for Part 3. Write that number here**\$8,925.00**Part 4: Describe Your Financial Assets****Do you own or have any legal or equitable interest in any of the following?**

**Current value of the
 portion you own?**
 Do not deduct secured
 claims or exemptions.

16. **Cash***Examples:* Money you have in your wallet, in your home, in a safe deposit box, and on hand when you file your petition☒ No☐ Yes.....17. **Deposits of money***Examples:* Checking, savings, or other financial accounts; certificates of deposit; shares in credit unions, brokerage houses, and other similar institutions. If you have multiple accounts with the same institution, list each.☐ No☒ Yes.....

Institution name:

17.1. **EDD Debit account** Bank of America\$3,793.0017.2. **Savings**Alliant Credit Union--Only funds are Covid-19
 relief funds from the government.\$1,407.00

Debtor 1 Jamie Lynn Gallian

Case number (if known) 8:21-bk-11710-ES

	Alliant Credit Union--Only funds are Covid-19 relief funds from the government.	\$2,600.00
--	--	-------------------

18. **Bonds, mutual funds, or publicly traded stocks**

Examples: Bond funds, investment accounts with brokerage firms, money market accounts

- ☒ No
☐ Yes..... Institution or issuer name:

19. **Non-publicly traded stock and interests in incorporated and unincorporated businesses, including an interest in an LLC, partnership, and joint venture**

- ☐ No
☒ Yes. Give specific information about them.....
Name of entity: % of ownership:

J-Sandcastle Co, LLC single member entity had a bank account of \$9000.00 assets to B/A

Cashiers Chk. Uncashed space 376 rent funds. Current less than \$500.00

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HCD Registration was transferred to debtor on 2/25/2021 after voluntary

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ing to Houser Bros Park Owner/Manager, Park Rules allegedly forbid home

to be held in business name; insistent only in an individual name. However, Park allows

homes held in Trust. Debtor unable to verify stated reason in RDRMHE Park Rules.

100 % \$500.00

J-PAD, LLC. Manager-Managed LLC. Assets include bank account of less than \$1,000;

B/A Cashier's Check approx, \$13,710.00, from 7/9/21 Chase Bank- J-Sandcastle Co LLC;

Rent Checks tendered for space 376 as agreed. Space rent tendered each month since filing

BK petition 7-9-21 by debtor (Alliant CU Acct.) through December 31, 2021, Concurrently

with CA Covid-19 Relief AWARD 10/27/2021; Houser Bros Co. caused further harm to

debtor, Houser Bros sent uncashed checks to various un-authorized entities including the

IRS, in violation of debtors STAY.

Debtors J-Pad, LLC, Holder of COTA perfected 1/14/2019.

100 % \$14,710.00

20. **Government and corporate bonds and other negotiable and non-negotiable instruments**

Negotiable instruments include personal checks, cashiers' checks, promissory notes, and money orders.

Non-negotiable instruments are those you cannot transfer to someone by signing or delivering them.

- ☒ No
☐ Yes. Give specific information about them
Issuer name:

21. **Retirement or pension accounts**

Examples: Interests in IRA, ERISA, Keogh, 401(k), 403(b), thrift savings accounts, or other pension or profit-sharing plans

- ☐ No
☒ Yes. List each account separately.
Type of account: Institution name:

IRA

Fidelity

\$ 7,400.00

22. **Security deposits and prepayments**

Your share of all unused deposits you have made so that you may continue service or use from a company

Examples: Agreements with landlords, prepaid rent, public utilities (electric, gas, water), telecommunications companies, or others

- ☐ Yes
☒ No. . Institution name or individual:

23. **Annuities** (A contract for a periodic payment of money to you, either for life or for a number of years)

- ☒ No
☐ Yes..... Issuer name and description.

24. **Interests in an education IRA, in an account in a qualified ABLE program, or under a qualified state tuition program.**

26 U.S.C. §§ 530(b)(1), 529A(b), and 529(b)(1).

Official Form 106A/B

Schedule A/B: Property

page 4

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Best Case Bankruptcy

Debtor 1 Jamie Lynn Gallian

Case number (if known) 8:21-bk-11710-ES

☒ No

☐ Yes..... Institution name and description. Separately file the records of any interests.11 U.S.C. § 521(c):

25. **Trusts, equitable or future interests in property (other than anything listed in line 1), and rights or powers exercisable for your benefit**

☒ No

☐ Yes. Give specific information about them...

26. **Patents, copyrights, trademarks, trade secrets, and other intellectual property**

Examples: Internet domain names, websites, proceeds from royalties and licensing agreements

☒ No

☐ Yes. Give specific information about them...

27. **Licenses, franchises, and other general intangibles**

Examples: Building permits, exclusive licenses, cooperative association holdings, liquor licenses, professional licenses

☒ No

☐ Yes. Give specific information about them...

Money or property owed to you?

**Current value of the
portion you own?**
Do not deduct secured
claims or exemptions.

28. **Tax refunds owed to you**

☒ No

☐ Yes. Give specific information about them, including whether you already filed the returns and the tax years.....

29. **Family support**

Examples: Past due or lump sum alimony, spousal support, child support, maintenance, divorce settlement, property settlement

☒ No

☐ Yes. Give specific information.....

30. **Other amounts someone owes you**

Examples: Unpaid wages, disability insurance payments, disability benefits, sick pay, vacation pay, workers' compensation, Social Security benefits; unpaid loans you made to someone else

☒ No

☐ Yes. Give specific information..

31. **Interests in insurance policies**

Examples: Health, disability, or life insurance; health savings account (HSA); credit, homeowner's, or renter's insurance

☒ No

☐ Yes. Name the insurance company of each policy and list its value.

Company name:

Beneficiary:

Surrender or refund
value:

32. **Any interest in property that is due you from someone who has died**

If you are the beneficiary of a living trust, expect proceeds from a life insurance policy, or are currently entitled to receive property because someone has died.

☐ No

☒ Yes. Give specific information..

**Probate estate of Charles J. Bradley, Jr. Case No. 30-2017-00915711.
Uncertain what, if any, proceeds will pass to debtor.**

**Creditor's claim Estate of Charles James Bradley Jr. filed by debtor for \$1
million, June 2020, denied by Administrator, Sandra Bradley, approx.
March 29, 2021. Unknown whether any recovery will be awarded.**

Unknown

Debtor 1 Jamie Lynn Gallian

Case number (if known) 8:21-bk-11710-ES

33. Claims against third parties, whether or not you have filed a lawsuit or made a demand for payment

Examples: Accidents, employment disputes, insurance claims, or rights to sue

☒ Yes. Describe each claim.

Wrongful termination against United Airlines. No lawsuit filed.

☐ No.

Claim filed Collective Bargaining with Association of Flight Attendants under Railway Labor Act. Arbitration with Compalny & AFA requested and being pursued.

Unknown

34. Other contingent and unliquidated claims of every nature, including counterclaims of the debtor and rights to set off claims

☐ No

☒ Yes. Describe each claim.....

34.1 Claim against Sandra Bradley and Houser Bros Co for failure to disclose real estate transaction May 2010, that ultimately lead to recordation of Grant Deed Doc # 2010219518 APN 937-63-053, Unit 53 in name of Houser Bros instead of intended transfer to Sandra L. Bradley Trust. No lawsuit filed yet.

Unknown

34.2 Possible claim against Sandra Bradley for failure to disclose previous alleged ARC violations in connection with improvements to Unit 53 in 2014, 2015, 2016, at Alderport, that occurred prior to debtor became legal owner of the Alderport property on March 23, 2017, the subject of 4/11/2017 FAC 5/16/2017, Gables HOA civil complaint.

Unknown

34.3 Multiple claims against Tract 10542 Master Lessor Houser Bros Co. and Park Manager Houser Bros Co. dba Rancho Del Rey Mobilehome Estates for Violation(s) Davis Stirling Act; Civil Code; violations of MRL §798, et seq. multiple acts (retaliation, discrimination, trespassing/unlawful entry; forcible detainer, wrongful eviction, failure to timely pursue/prosecute frivolous UD claim filed 1/2/19. Failure to counter sign Consumer Lease Agreement with Applicant(s); Registered Owners of bona fide purchase 2014 Skyline Custom Villa, LBM1081

Possible award of Attorney Fees under Davis Stirling Act; CA Civil Code; and (MRL)

Unknown

34.4 Personal Injury claim pending against Huntington Beach Gables HOA; Jesus Jasso, Jr. et al. Case No. 30-2020-01153679.

Estimated damages approximately \$195,000.

Unknown

34.5 Due to pending litigation potential right of debtor to reversionary interest unexpired Ground Leasehold in Condominium Project Lot 1 & 2, Tract 10542, APN 178-011-01; 178-011-16, Holding Alternate APN 178-771-03;

Original Master Lessor Houser Bros Co. and Robert P. Warmington, an Ind. Original Tenant; Robert P. Warmington, an Ind. Sublessor, assigned to Robert P. Warmington Company, Subleasee; Further assigned Declarant Robert P. Warmington Co. Sublessor assigned certain rights of the Declarant to various consumers until 2059, an 80-year Ground Leasehold and Subcondominium Leasehold Tract 10542, Lot 1 and 2; Further rights clarified by Master Lessor and Sublessor in that certain First Amendment to CC&Rs filed OC Clerk Recorder, 8/5/1980, Doc No. 8005, detailing Consumer's Interest in Master Ground-Leasehold and Subcondominium Leasehold relative to Lot 1 & 2 Tract 10542 Hunt. Beach.

(Huntington Beach Gables HOA has filed a cross-complaint pending OCSC, in which Gables HOA seek a voiding of the debtors sale of unencumbered fee interest in debtor's previous residence; Ground Leasehold and Subcondominium Leasehold sold on 10/31/2018 to a bona fide purchaser for value, Randall Nickels, including rights of Assignment of unexpired term of 80 yr Ground Leasehold and Subcondominium Leasehold from Debtor to purchaser Randall Nickels).

Unknown

34.6 Potential Victim Restitution Order from Defendant Jesus Jasso, Jr, PC§242 OCSC Case No. 19WM09951
Approx. economic damages \$ 73,000.00

Unknown

35. Any financial assets you did not already list

☐ No

☒ Yes. Give specific information..

CA COVID-19 Award - State of California. Landlord refused to participate or apply on behalf of this tenant after receiving Tenants Declaration re: Covid related afflictions from Tenant. Tenant applied 6/9/21 and was Awarded Relief on 10/27/2021.

\$24,301.55

Landlord waited three weeks to notify Counsel in UD case of funds received. Landlord refused to dismiss UD case. Application to avoid Lease Forfeiture Filed @ CJC.

36. Add the dollar value of all of your entries from Part 4, including any entries for pages you have attached for Part 4. Write that number here.....

\$ 54,711.55

Part 5: Describe Any Business-Related Property You Own or Have an Interest In. List any real estate in Part 1.

Debtor 1 Jamie Lynn GallianCase number (if known) 8:21-bk-11710-ES

37. Do you own or have any legal or equitable interest in any business-related property?

☒ No. Go to Part 6.☐ Yes. Go to line 38.**Part 6: Describe Any Farm- and Commercial Fishing-Related Property You Own or Have an Interest In.**

If you own or have an interest in farmland, list it in Part 1.

46. Do you own or have any legal or equitable interest in any farm- or commercial fishing-related property?

☒ No. Go to Part 7.☐ Yes. Go to line 47.**Part 7: Describe All Property You Own or Have an Interest in That You Did Not List Above**

53. Do you have other property of any kind you did not already list?

Examples: Season tickets, country club membership

☒ No☐ Yes. Give specific information.....

54. Add the dollar value of all of your entries from Part 7. Write that number here

\$0.00**Part 8: List the Totals of Each Part of this Form**

55. Part 1: Total real estate, line 2		<u>\$235,000.00</u>
56. Part 2: Total vehicles, line 5	<u>\$0.00</u>	
57. Part 3: Total personal and household items, line 15	<u>\$8,925.00</u>	
58. Part 4: Total financial assets, line 36	<u>\$54,711.55</u>	
59. Part 5: Total business-related property, line 45	<u>\$0.00</u>	
60. Part 6: Total farm- and fishing-related property, line 52	<u>\$0.00</u>	
61. Part 7: Total other property not listed, line 54	+ <u>\$0.00</u>	
62. Total personal property. Add lines 56 through 61...	<u>\$63,636.55</u>	Copy personal property total <u>\$63,636.55</u>
63. Total of all property on Schedule A/B. Add line 55 + line 62		<u>\$298,636.55</u>

EXHIBIT 9

Fill in this information to identify your case:

Debtor 1 **Jamie Lynn Gallian**
First Name Middle Name Last Name

Debtor 2
(Spouse if, filing) First Name Middle Name Last Name

United States Bankruptcy Court for the: **CENTRAL DISTRICT OF CALIFORNIA--SANTA ANA DIVISION**

Case number **8:21-bk-11710-ES**
(if known)

☐ Check if this is an
amended filing

Official Form 106D

Schedule D: Creditors Who Have Claims Secured by Property

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, copy the Additional Page, fill it out, number the entries, and attach it to this form. On the top of any additional pages, write your name and case number (if known).

1. Do any creditors have claims secured by your property?

- ☐ No. Check this box and submit this form to the court with your other schedules. You have nothing else to report on this form.
- ☒ Yes. Fill in all of the information below.

Part 1: List All Secured Claims

2. List all secured claims. If a creditor has more than one secured claim, list the creditor separately for each claim. If more than one creditor has a particular claim, list the other creditors in Part 2. As much as possible, list the claims in alphabetical order according to the creditor's name.

	Column A Amount of claim Do not deduct the value of collateral.	Column B Value of collateral that supports this claim	Column C Unsecured portion if any
2.1 Jamie Gallian; Steven Gallian; Brian Gallian Creditor's Name	\$225,000.00	\$235,000.00	\$10,000.00
Describe the property that secures the claim: 16222 Monterey Ln. Spc 376 Huntington Beach, CA 92649 Orange County APN: 891-569-62; 2014 Skyline Custom Villa Manufactured Home. Decal No. LBM1081. Serial Number AC7V710394GB 56'x15'2"; Serial Number AC7V710394GA 60'x15'2".			
As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed			
Nature of lien. Check all that apply. <input checked="" type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input type="checkbox"/> Judgment lien from a lawsuit <input type="checkbox"/> Other (including a right to offset)			
CA Sec. of State UCC-1, File No. 19761916827, 1/14/2019. Manufactured Home Transaction, Amended 09/12/2021. Debtor is Holder of a Security Agreement and Promissory Note dated 11/16/2018 against LBM1081 Serial No. 7V710394GB/GA. HCD COTA perfected 1/14/2019. HCD Registration changed 2/25/2021 named Ind., Jamie Gallian, to obtain promised countersigned lease hold agreement from Landlord and end Frivolous Unlawful-Detainer-Case filed 1/2/19, pending for three years. Debtors single member LLC original HCD registration refused a Ground Lease Agreement Sp 376.			
16222 Monterey Ln. #376 Huntington Beach, CA 92649 Number, Street, City, State & Zip Code			
Who owes the debt? Check one. <input checked="" type="checkbox"/> Debtor 1 only <input type="checkbox"/> Debtor 2 only <input type="checkbox"/> Debtor 1 and Debtor 2 only <input type="checkbox"/> At least one of the debtors and another <input type="checkbox"/> Check if this claim relates to a community debt	Date debt was incurred		
Last 4 digits of account number			

Debtor 1 **Jamie Lynn Gallian**

First Name

Middle Name

Last Name

Case number (if known)

8:21-bk-11710-ES

Add the dollar value of your entries in Column A on this page. Write that number here:
If this is the last page of your form, add the dollar value totals from all pages.
Write that number here:

\$225,000.00

\$225,000.00

Part 2: List Others to Be Notified for a Debt That You Already Listed

Use this page only if you have others to be notified about your bankruptcy for a debt that you already listed in Part 1. For example, if a collection agency is trying to collect from you for a debt you owe to someone else, list the creditor in Part 1, and then list the collection agency here. Similarly, if you have more than one creditor for any of the debts that you listed in Part 1, list the additional creditors here. If you do not have additional persons to be notified for any debts in Part 1, do not fill out or submit this page.

EXHIBIT 10

Fill in this information to identify your case and this filing:			
Debtor 1	Jamie Lynn Gallian		
	First Name	Middle Name	Last Name
Debtor 2 (Spouse, if filing)			
	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	CENTRAL DISTRICT OF CALIFORNIA—SANTA ANA DIVISION		
Case number	8:21-bk-11710-ES		
<input type="checkbox"/> Check if this is an amended filing			

Official Form 106A/B
Schedule A/B: Property

12/15

In each category, separately list and describe items. List an asset only once. If an asset fits in more than one category, list the asset in the category where you think it fits best. Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Each Residence, Building, Land, or Other Real Estate You Own or Have an Interest In

1. Do you own or have any legal or equitable interest in any residence, building, land, or similar property?

- ☐ No. Go to Part 2.
☒ Yes. Where is the property?

1.1

16222 Monterey Ln. Unit 376

Street address, if available, or other description

Huntington Beach CA 92649-0000

City State ZIP Code

Orange

County

What is the property? Check all that apply

- ☐ Single-family home
☐ Duplex or multi-unit building
☐ Condominium or cooperative
☒ Manufactured or mobile home
☐ Land
☐ Investment property
☐ Timeshare
☐ Other

Who has an interest in the property? Check one

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another

Do not deduct secured claims or exemptions. Put the amount of any secured claims on *Schedule D: Creditors Who Have Claims Secured by Property*.

Current value of the entire property?
\$ unknown

Current value of the portion you own?
\$235,000.00

Describe the nature of your ownership interest (such as fee simple, tenancy by the entireties, or a life estate), if known.

Existing 1979 80 year Ground Leasehold Parcel 1 & 2 Tract 10542, Unit(s) 1,2,3,4

☐ Check if this is community property (see instructions)

Other information you wish to add about this item, such as local property identification number: **LPT 891-569-62**

2. Add the dollar value of the portion you own for all of your entries from Part 1, including any entries for pages you have attached for Part 1. Write that number here.....=>

\$235,000.00

Part 2: Describe Your Vehicles

Do you own, lease, or have legal or equitable interest in any vehicles, whether they are registered or not? Include any vehicles you own that someone else drives. If you lease a vehicle, also report it on *Schedule G: Executory Contracts and Unexpired Leases*.

Case 8:21-bk-11710-ES Doc 72 Filed 03/11/22 Entered 03/14/22 09:54:23 Desc
Main Document Page 14 of 64

Debtor 1 **Jamie Lynn Gallian**

Case number (if known) **8:21-bk-11710-ES**

3. Cars, vans, trucks, tractors, sport utility vehicles, motorcycles

- ☒ No
☐ Yes

4. Watercraft, aircraft, motor homes, ATVs and other recreational vehicles, other vehicles, and accessories
Examples: Boats, trailers, motors, personal watercraft, fishing vessels, snowmobiles, motorcycle accessories

- ☒ No
☐ Yes

5. Add the dollar value of the portion you own for all of your entries from Part 2, including any entries for pages you have attached for Part 2. Write that number here.....=>

\$0.00

Part 3: Describe Your Personal and Household Items

Do you own or have any legal or equitable interest in any of the following items?

Current value of the portion you own?
Do not deduct secured claims or exemptions.

6. Household goods and furnishings

Examples: Major appliances, furniture, linens, china, kitchenware

- ☐ No
☒ Yes. Describe.....

Misc. household goods and furnishings
Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649

\$3,500.00

waterford crystal set red and white wine glasses

\$1,000.00

7. Electronics

Examples: Televisions and radios; audio, video, stereo, and digital equipment; computers, printers, scanners; music collections; electronic devices including cell phones, cameras, media players, games

- ☐ No
☒ Yes. Describe.....

Wall television, computer, printer and peripherals
Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649

\$500.00

8. Collectibles of value

Examples: Antiques and figurines; paintings, prints, or other artwork; books, pictures, or other art objects; stamp, coin, or baseball card collections; other collections, memorabilia, collectibles

- ☐ No
☒ Yes. Describe.....

Lladro figurine collection (20)

\$1,900.00

9. Equipment for sports and hobbies

Examples: Sports, photographic, exercise, and other hobby equipment; bicycles, pool tables, golf clubs, skis; canoes and kayaks; carpentry tools; musical instruments

- ☒ No
☐ Yes. Describe.....

10. Firearms

Examples: Pistols, rifles, shotguns, ammunition, and related equipment

- ☒ No
☐ Yes. Describe.....

Official Form 106A/B

Schedule A/B: Property

page 2

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Best Case Bankruptcy

Debtor 1 Jamie Lynn Gallian

Case number (if known) 8:21-bk-11710-ES

11. **Clothes**

Examples: Everyday clothes, furs, leather coats, designer wear, shoes, accessories

☐ No

☒ Yes. Describe.....

Misc. clothing

Location: 16222 Monterey Lane, Space 376, Huntington Beach CA
92649

\$1,000.00

12. **Jewelry**

Examples: Everyday jewelry, costume jewelry, engagement rings, wedding rings, heirloom jewelry, watches, gems, gold, silver

☐ No

☒ Yes. Describe.....

Movado wrist watch (20 yrs. old); costume jewelry, misc. non-gold
chains/bracelets, and earrings.

Location: 16222 Monterey Lane, Space 376, Huntington Beach CA
92649

\$1,000.00

13. **Non-farm animals**

Examples: Dogs, cats, birds, horses

☐ No

☒ Yes. Describe.....

5-year old Wired Terrier Dog

\$25.00

14. **Any other personal and household items you did not already list, including any health aids you did not list**

☒ No

☐ Yes. Give specific information.....

15. **Add the dollar value of all of your entries from Part 3, including any entries for pages you have attached for Part 3. Write that number here**

\$8,925.00

Part 4: Describe Your Financial Assets

Do you own or have any legal or equitable interest in any of the following?

Current value of the
portion you own?
Do not deduct secured
claims or exemptions.

16. **Cash**

Examples: Money you have in your wallet, in your home, in a safe deposit box, and on hand when you file your petition

☒ No

☐ Yes.....

17. **Deposits of money**

Examples: Checking, savings, or other financial accounts; certificates of deposit; shares in credit unions, brokerage houses, and other similar institutions. If you have multiple accounts with the same institution, list each.

☐ No

☒ Yes.....

Institution name:

17.1. **EDD Debit account** Bank of America

\$3,793.00

17.2. **Savings**

Alliant Credit Union--Only funds are Covid-19
relief funds from the government.

\$1,407.00

Debtor 1 **Jamie Lynn Gallian**

Case number (if known) **8:21-bk-11710-ES**

17.3. **Savings** **Alliant Credit Union--Only funds are Covid-19 relief funds from the government.** **\$2,600.00**

18. Bonds, mutual funds, or publicly traded stocks

Examples: Bond funds, investment accounts with brokerage firms, money market accounts

☒ No

☐ Yes.....

Institution or issuer name:

19. Non-publicly traded stock and interests in incorporated and unincorporated businesses, including an interest in an LLC, partnership, and joint venture

☐ No

☒ Yes. Give specific information about them.....Name of entity:

% of ownership:

19.1 J-Sandcastle Co, LLC- Assets include a bank account of less than \$1,000.
Debtor peacefully resided at 4476 Alderport since 11/23/2009. On 8/5/2018, debtor was battered at her home in HOA. Criminal charges PC §242 were filed; trial is pending 19WM00951. Request for victim restitution. Debtor moved out of the HOA-Alderport home out of fear on 9/11/18. On 9/11/2018, a three year residential property lease 5782 Pinon Dr signed. Debtors Alderport home sold on 10/31/2018. Debtor purchased investment rental property on 11/1/2018 within TRACT 10542 APN 178-011-01 located in Huntington Harbour with proceeds from unencumbered sale of her Alderport with the intent of living in the property at the end of the signed lease commitment. Debtors Retirement Funds were completely depleted from 2016-2019 legal expenses incurred defending Gables HOA civil complaints filed against her On 11/8/18, ST Court denied Gables HOA MOTION to freeze debtors equity in the Alderport sale. Debtor executed a Security Agreement and Promissory Note with the LLC dated 11/16/2018, perfected HCD Certificate of Title and UCC-1 on 1/14/2019 No. 19-7691916827. Debtor continued on medical LOA and never returned to her 20 year employment as a Flight Attendant due to the 8/5/18 battery with severe nerve injury. On February 1, 2019, Debtor successfully terminated the 3 year Pinon Drive lease agreement with Landlord Henry Newton. Debtors primary residence is 16222 Monterey Ln. Unit 376, Located on Lot 2 Tract 10542 Unit 4 per 8/7/1979 City of HB.
19.2 J-PAD, LLC. has a bank account of around \$ 500.00

100 % \$1,000.00

100 % \$ 500.00

20. Government and corporate bonds and other negotiable and non-negotiable instruments

Negotiable instruments include personal checks, cashiers' checks, promissory notes, and money orders.

Non-negotiable instruments are those you cannot transfer to someone by signing or delivering them.

☒ No

☐ Yes. Give specific information about them

Issuer name:

21. Retirement or pension accounts

Examples: Interests in IRA, ERISA, Keogh, 401(k), 403(b), thrift savings accounts, or other pension or profit-sharing plans

☐ No

☒ Yes. List each account separately.

Type of account:

Institution name:

IRA

Fidelity

\$7,400.00

22. Security deposits and prepayments

Your share of all unused deposits you have made so that you may continue service or use from a company

Examples: Agreements with landlords, prepaid rent, public utilities (electric, gas, water), telecommunications companies, or others

☒ No

Yes.

Institution name or individual:

23. Annuities (A contract for a periodic payment of money to you, either for life or for a number of years)

☒ No

☐ Yes.....

Issuer name and description.

24. Interests in an education IRA, in an account in a qualified ABLE program, or under a qualified state tuition program.

26 U.S.C. §§ 530(b)(1), 529A(b), and 529(b)(1).

Official Form 106A/B

Schedule A/B: Property

page 4

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Best Case Bankruptcy

Debtor 1 **Jamie Lynn Gallian**

Case number (if known) **8:21-bk-11710-ES**

☒ No

☐ Yes..... Institution name and description. Separately file the records of any interests. 11 U.S.C. § 521(c):

25. Trusts, equitable or future interests in property (other than anything listed in line 1), and rights or powers exercisable for your benefit

☒ No

☐ Yes. Give specific information about them...

26. Patents, copyrights, trademarks, trade secrets, and other intellectual property

Examples: Internet domain names, websites, proceeds from royalties and licensing agreements

☒ No

☐ Yes. Give specific information about them...

27. Licenses, franchises, and other general intangibles

Examples: Building permits, exclusive licenses, cooperative association holdings, liquor licenses, professional licenses

☒ No

☐ Yes. Give specific information about them...

Money or property owed to you?

**Current value of the
portion you own?**
Do not deduct secured
claims or exemptions.

28. Tax refunds owed to you

☒ No

☐ Yes. Give specific information about them, including whether you already filed the returns and the tax years.....

29. Family support

Examples: Past due or lump sum alimony, spousal support, child support, maintenance, divorce settlement, property settlement

☒ No

☐ Yes. Give specific information.....

30. Other amounts someone owes you

Examples: Unpaid wages, disability insurance payments, disability benefits, sick pay, vacation pay, workers' compensation, Social Security benefits; unpaid loans you made to someone else

☒ No

☐ Yes. Give specific information..

31. Interests in insurance policies

Examples: Health, disability, or life insurance; health savings account (HSA); credit, homeowner's, or renter's insurance

☒ No

☐ Yes. Name the insurance company of each policy and list its value.

Company name:

Beneficiary:

Surrender or refund
value:

32. Any interest in property that is due you from someone who has died

If you are the beneficiary of a living trust, expect proceeds from a life insurance policy, or are currently entitled to receive property because someone has died.

☐ No

☒ Yes. Give specific information..

32.1

Probate estate of Charles J. Bradley, Jr. Case No.
30-2017-00915711. Uncertain what, if any, proceeds will pass
to debtor.

Unknown

32.2

"Creditor's claim" in probate estate of Charles Bradley filed
by debtor for \$1 million. Unknown whether any recovery will
be awarded or available.

Unknown

Debtor 1 **Jamie Lynn Gallian**

Case number (if known) **8:21-bk-11710-ES**

33. **Claims against third parties, whether or not you have filed a lawsuit or made a demand for payment**
Examples: Accidents, employment disputes, insurance claims, or rights to sue

☒ No
☐ Yes. Describe each claim.....

34. **Other contingent and unliquidated claims of every nature, including counterclaims of the debtor and rights to set off claims**

☐ No
☒ Yes. Describe each claim.....

34.1

Potential claim for bad faith denial of insurance against Mercury Insurance Company failure to defend/indemnify HOA Civil Action filed 4/11/2017, 18 days after title recorded. Debtor purchased homeowners insurance policy on 3/22/17

Unknown

34.2

Potential Victim Restitution Award from Jesus Jesus Jr, for battery 8/5/2018. Criminal Case pending 19WM09951. Estimated economic damages exceed \$73,000.00

Unknown

34.3

Claim against Houser Bros Co. dba Rancho Del Rey Mobilehome Estates for Violation(s) of Davis Stirling Act, MRL §798, et seq. multiple acts of retaliation, discrimination, trespassing/unlawful entry; forcible detainer, wrongful eviction, failure to timely pursue/prosecute frivolous UD claim pending since 1/2/19. Failure to apply to CA Covid19 Relief after debtor delivered 9/7/20 Declaration of Covid afflictions and hardship. No lawsuit yet filed.

Unknown

34.4

Personal Injury claim against Huntington Beach Gables HOA; Jesus Jasso, Jr. Case No. 30-2020-01153679. Estimated damages \$195,000.

Unknown

- 34.5 Potential Claim against Master Lessor, Houser Company, Lessor(s) BS Investors, LP, S4 I, GP due to overpayment of Ground Leasehold fees charged to Consumers. Master Lessor Houser Company recorded Annexation approx. 8/17/1979. The Original Tenant Robert P. Warmington, an Ind., ro Sublessor RPW, Co. and Houser Bros Co dba Rancho Del Rey MHE misrepresent to consumers Fee Interest vs, Air-Space Condominium Project within Parcel 1 & Parcel 2; Ground Leases recorded in violation of known City of Huntington Beach Ordinance from City Attorney. Master Lessor, Tenant, & RPW, Co recorded 1979 Ground Lease and Subcondominium Lease on APN 178-011-01, and not APN 178-771-03. Only easements were recorded. Additionally, Lessors Amended CC&Rs 8/5/1980 after Final Subdivision Report was issued by DRE July 1980, without Notice to Consumers or providing NT of Copy of Rec, First Amendment to CC&Rs Doc No. 1980-5002. Subsequently in 2005, Craig Houser, RDRMHE recorded Amendment to all 80 Ground Leases without Notice to Park Consumers or Gables HOA Consumers. Huntington Beach Gables HOA has a cross-complaint pending in the ST. Court Case Randall Nickels vs. Huntington Beach Gables HOA, et al. 30-2020-01163055-CU-OR-CJC which the HOA seeks a voiding of the sale and Assignment of unexpired term of Subcondominium Leasehold APN 937-63-053, on October 31, 2018, from Debtor to bona fide purchaser Randall Nickels. Potential Cross-Petition not yet filed.

Unknown

35. **Any financial assets you did not already list**

☐ No
☒ Yes. Give specific information..

CA COVID-19 Rent Relief Award 10/27/2021, post petition tendered to Houser Bros Co. Ck No. 58066665 \$ 24,301.55.
Not property of the estate.

\$ 0.00

35.1

☒ Yes.

Bank of America Cashier's Check [uncashed] tendered rent chk Houser Bros Co.
Not property of the estate. \$ 14,118.00

\$ 0.00

36. **Add the dollar value of all of your entries from Part 4, including any entries for pages you have attached for Part 4. Write that number here.....**

\$ 16,700.00

Part 5: Describe Any Business-Related Property You Own or Have an Interest In. List any real estate in Part 1.

Official Form 106A/B

Schedule A/B: Property

page 6

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Best Case Bankruptcy

Debtor 1 Jamie Lynn Gallian

Case number (if known) 8:21-bk-11710-ES

37. Do you own or have any legal or equitable interest in any business-related property?

☒ No. Go to Part 6.

☐ Yes. Go to line 38.

Part 6: Describe Any Farm- and Commercial Fishing-Related Property You Own or Have an Interest In.
If you own or have an interest in farmland, list it in Part 1.

46. Do you own or have any legal or equitable interest in any farm- or commercial fishing-related property?

☒ No. Go to Part 7.

☐ Yes. Go to line 47.

Part 7: Describe All Property You Own or Have an Interest in That You Did Not List Above

53. Do you have other property of any kind you did not already list?

Examples: Season tickets, country club membership

☒ No

☐ Yes. Give specific information.....

54. Add the dollar value of all of your entries from Part 7. Write that number here

\$0.00

Part 8: List the Totals of Each Part of this Form

55. Part 1: Total real estate, line 2		\$235,000.00
56. Part 2: Total vehicles, line 5	\$0.00	
57. Part 3: Total personal and household items, line 15	\$ 8,925.00	
58. Part 4: Total financial assets, line 36	\$ 16,700.00	
59. Part 5: Total business-related property, line 45	\$0.00	
60. Part 6: Total farm- and fishing-related property, line 52	\$0.00	
61. Part 7: Total other property not listed, line 54	\$0.00	
	+	
62. Total personal property. Add lines 56 through 61...	\$25,625.00	Copy personal property total \$25,625.00
63. Total of all property on Schedule A/B. Add line 55 + line 62		\$260,625.00

Fill in this information to identify your case:

Debtor 1	Jamie Lynn Gallian		
	First Name	Middle Name	Last Name
Debtor 2 (Spouse if, filing)			
	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	CENTRAL DISTRICT OF CALIFORNIA--SANTA ANA DIVISION		
Case number (if known)	8:21-bk-11710-ES		

☒ Check if this is an amended filing

Official Form 106C

Schedule C: The Property You Claim as Exempt

4/19

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. Using the property you listed on *Schedule A/B: Property* (Official Form 106A/B) as your source, list the property that you claim as exempt. If more space is needed, fill out and attach to this page as many copies of *Part 2: Additional Page* as necessary. On the top of any additional pages, write your name and case number (if known).

For each item of property you claim as exempt, you must specify the amount of the exemption you claim. One way of doing so is to state a specific dollar amount as exempt. Alternatively, you may claim the full fair market value of the property being exempted up to the amount of any applicable statutory limit. Some exemptions—such as those for health aids, rights to receive certain benefits, and tax-exempt retirement funds—may be unlimited in dollar amount. However, if you claim an exemption of 100% of fair market value under a law that limits the exemption to a particular dollar amount and the value of the property is determined to exceed that amount, your exemption would be limited to the applicable statutory amount.

Part 1: Identify the Property You Claim as Exempt

1. Which set of exemptions are you claiming? Check one only, even if your spouse is filing with you.

- ☒ You are claiming state and federal nonbankruptcy exemptions. 11 U.S.C. § 522(b)(3)
☐ You are claiming federal exemptions. 11 U.S.C. § 522(b)(2)

2. For any property you list on *Schedule A/B* that you claim as exempt, fill in the information below.

Brief description of the property and line on <i>Schedule A/B</i> that lists this property	Current value of the portion you own Copy the value from <i>Schedule A/B</i>	Amount of the exemption you claim Check only one box for each exemption.	Specific laws that allow exemption
16222 Monterey Ln. Spc 376 Huntington Beach, CA 92649 Orange County APN: 891-569-62; 2014 Skyline Custom Villa Manufactured Home. Decal No. LBM1081. Serial Number AC7V710394GB 56"x15'2"; Serial Number AC7V710394GA 60"x15'2". Line from <i>Schedule A/B</i> : 1.1	\$235,000.00	<input checked="" type="checkbox"/> \$600,000.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.730
Misc. household goods and furnishings Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649 Line from <i>Schedule A/B</i> : 6.1	\$3,500.00	<input checked="" type="checkbox"/> \$3,500.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.020
waterford crystal set red and white wine glasses Line from <i>Schedule A/B</i> : 6.2	\$1,000.00	<input checked="" type="checkbox"/> \$1,000.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.040

Debtor 1	Case number (if known)		
Jamie Lynn Gallian	8:21-bk-11710-ES		
Brief description of the property and line on Schedule A/B that lists this property	Current value of the portion you own Copy the value from Schedule A/B	Amount of the exemption you claim Check only one box for each exemption.	Specific laws that allow exemption
Wall television, computer, printer and peripherals Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649 Line from Schedule A/B: 7.1	\$500.00	<input checked="" type="checkbox"/> \$500.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.020
Lladro figurine collection (20) Line from Schedule A/B: 8.1	\$1,900.00	<input checked="" type="checkbox"/> \$1,900.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.040
Misc. clothing Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649 Line from Schedule A/B: 11.1	\$1,000.00	<input checked="" type="checkbox"/> \$1,000.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.020
Movado wrist watch (20 yrs. old); costume jewelry, misc. non-gold chains/bracelets, and earrings. Location: 16222 Monterey Lane, Space 376, Huntington Beach CA 92649 Line from Schedule A/B: 12.1	\$1,000.00	<input checked="" type="checkbox"/> \$1,000.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.040
5-year old Wired Terrier Dog Line from Schedule A/B: 13.1	\$25.00	<input checked="" type="checkbox"/> \$25.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.020
EDD Debit account: Bank of America Line from Schedule A/B: 17.1	\$3,793.00	<input checked="" type="checkbox"/> \$3,793.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.225
Savings: Alliant Credit Union--Only funds are Covid-19 relief funds from the government. Line from Schedule A/B: 17.2	\$1,407.00	<input checked="" type="checkbox"/> \$1,407.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.220
Savings: Alliant Credit Union--Only funds are Covid-19 relief funds from the government. Line from Schedule A/B: 17.3	\$2,600.00	<input checked="" type="checkbox"/> \$381.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.220
Savings: Alliant Credit Union--Only funds are Covid-19 relief funds from the government. Line from Schedule A/B: 17.3	\$2,600.00	<input checked="" type="checkbox"/> \$2,219.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.225
IRA: Fidelity Line from Schedule A/B: 21.1	\$7,400.00	<input checked="" type="checkbox"/> \$7,400.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.115(a)(1) & (2), (b)

Debtor 1 Jamie Lynn Gallian	Case number (if known) 8:21-bk-11710-ES		
Brief description of the property and line on Schedule A/B that lists this property	Current value of the portion you own Copy the value from Schedule A/B	Amount of the exemption you claim Check only one box for each exemption.	Specific laws that allow exemption
IRA: Fidelity Line from Schedule A/B: 21.1	\$7,400.00	<input checked="" type="checkbox"/> \$7,400.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(b)(3)(C)
Personal Injury claim against Huntington Beach Gables HOA; Jesus Jasso, Jr. Case No. 30-2020-01153679. Estimated damages \$195,000. Line from Schedule A/B: 34.4	Unknown	<input checked="" type="checkbox"/> \$195,000.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.140
Potential Victim Restitution Order Jesus Jasso, Jr, OCSC 19WM09951 Line from Schedule A/B: 34.2	Unknown	XX \$73,000.00 100% of fair market value, up to any applicable statutory limit	C.C.P. § 704.140

3. **Are you claiming a homestead exemption of more than \$170,350?**
(Subject to adjustment on 4/01/22 and every 3 years after that for cases filed on or after the date of adjustment.)
- ☐ No
- ☒ Yes. Did you acquire the property covered by the exemption within 1,215 days before you filed this case?
- ☐ No
- ☒ Yes

EXHIBIT 11

Debtor 1 Jamie Lynn Gallian
First Name Middle Name Last Name
Debtor 2
(Spouse if, filing) First Name Middle Name Last Name
United States Bankruptcy Court for the: CENTRAL DISTRICT OF CALIFORNIA--SANTA ANA DIVISION
Case number 8:21-bk-11710-ES
(if known)

☐ Check if this is an
amended filing

Official Form 106D

Schedule D: Creditors Who Have Claims Secured by Property

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, copy the Additional Page, fill it out, number the entries, and attach it to this form. On the top of any additional pages, write your name and case number (if known).

1. Do any creditors have claims secured by your property?

- ☐ No. Check this box and submit this form to the court with your other schedules. You have nothing else to report on this form.
☒ Yes. Fill in all of the information below.

Part 1: List All Secured Claims

2. List all secured claims. If a creditor has more than one secured claim, list the creditor separately for each claim. If more than one creditor has a particular claim, list the other creditors in Part 2. As much as possible, list the claims in alphabetical order according to the creditor's name.

Column A	Column B	Column C
Amount of claim Do not deduct the value of collateral.	Value of collateral that supports this claim	Unsecured portion If any
\$ 0.00	\$235,000.00	\$0.00

2.1 **Orange County Tax Assessor**
Creditor's Name
P.O. Box 1438
Santa Ana, CA
92701
Number, Street, City, State & Zip Code

Describe the property that secures the claim:

16222 Monterey Ln. Unit 376
Huntington Beach, CA 92649
Orange County
APN: 891-569-62;
Decal No. LBM1081.

As of the date you file, the claim is: Check all that apply.

- ☐ Contingent
☐ Unliquidated
☐ Disputed

Nature of lien. Check all that apply

- ☒ An agreement you made (such as mortgage or secured car loan)
☐ Statutory lien (such as tax lien, mechanic's lien)
☐ Judgment lien from a lawsuit
☐ Other (including a right to offset)

Who owes the debt? Check one.

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim relates to a community debt

Date debt was incurred

Last 4 digits of account number LPT 891-569-62

Debtor 1 **Jamie Lynn Gallian** Case number (if known) **8:21-bk-11710-ES**
First Name Middle Name Last Name

2.2 Janine Jasso Describe the property that secures the claim: \$ 46,138.00 \$ 235,000.00 \$ 188,862.00
Creditor's Name

**16025 Warmington Lane
Huntington Beach, CA
92649**

Number, Street, City, State & Zip Code

**16222 Monterey Ln. Unit 376 Huntington
Beach, CA 92649 Orange County
APN: 891-569-62; LBM1081**

**Judgment Superior Court of California for
the CO of Orange Case No.
30-2017-00913985;
Recorded Doc No. 2018000467142**

As of the date you file, the claim is: Check all that
apply.

- ☒ Contingent
☒ Unliquidated
☐ Disputed

Nature of lien. Check all that apply.

- ☐ An agreement you made (such as mortgage or secured
car loan)
☐ Statutory lien (such as tax lien, mechanic's lien)
☒ Judgment lien from a lawsuit
☐ Other (including a right to offset)

Who owes the debt? Check one.

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim relates to a
community debt

Date debt was incurred **12/4/2018**

Last 4 digits of account number

2.3 Jennifer Paulin Describe the property that secures the claim: \$ 0.00 \$ 235,000.00 \$ 0.00
Creditor's Name

**4446 Alderport Drive
Huntington Beach, CA
92649**

Number, Street, City, State & Zip Code

**16222 Monterey Ln. Unit 376 Huntington
Beach, CA 92649 Orange County
APN: 891-569-62; LBM1081.**

**Judgment Superior Court of California for
the CO of Orange Case No.
30-2017-00913985;
Recorded Doc No. 2018000467142**

As of the date you file, the claim is: Check all that
apply.

- ☒ Contingent
☒ Unliquidated
☐ Disputed

Nature of lien. Check all that apply.

- ☐ An agreement you made (such as mortgage or secured
car loan)
☐ Statutory lien (such as tax lien, mechanic's lien)
☒ Judgment lien from a lawsuit
☐ Other (including a right to offset)

Who owes the debt? Check one.

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim relates to a
community debt

Date debt was incurred **12/4/2018**

Last 4 digits of account number

Add the dollar value of your entries in Column A on this page. Write that number here:
If this is the last page of your form, add the dollar value totals from all pages.
Write that number here:

\$ 46,138.00

Part 2: List Others to Be Notified for a Debt That You Already Listed

Use this page only if you have others to be notified about your bankruptcy for a debt that you already listed in Part 1. For example, if a collection agency is trying to collect from you for a debt you owe to someone else, list the creditor in Part 1, and then list the collection agency here. Similarly, if you have more than one creditor for any of the debts that you listed in Part 1, list the additional creditors here. If you do not have additional persons to be notified for any debts in Part 1, do not fill out or submit this page.

Debtor 1 **Jamie Lynn Gallian** Case number (if known) **8:21-bk-11710-ES**
First Name Middle Name Last Name

2.4 Lindy Beck Creditor's Name 4443 Chase Huntington Beach, CA 92649 Number, Street, City, State & Zip Code	Describe the property that secures the claim: 16222 Monterey Ln. Unit 376 Huntington Beach, CA 92649 Orange County APN: 891-569-62; LBM1081 Judgment Superior Court of California for the CO of Orange Case No. 30-2017-00913985; Recorded Doc No. 2018000467142 As of the date you file, the claim is: Check all that apply. <input checked="" type="checkbox"/> Contingent <input checked="" type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Nature of lien. Check all that apply. <input type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input checked="" type="checkbox"/> Judgment lien from a lawsuit <input type="checkbox"/> Other (including a right to offset) Date debt was incurred 12/4/2018 Last 4 digits of account number	\$ 0.00 \$ 235,000.00 \$ 0.00
---	---	--

2.5 Lori Burrett Creditor's Name 16107 Sherlock Huntington Beach, CA 92649 Number, Street, City, State & Zip Code	Describe the property that secures the claim: 16222 Monterey Ln. Unit 376 Huntington Beach, CA 92649 Orange County APN: 891-569-62; LBM1081. Judgment Superior Court of California for the CO of Orange Case No. 30-2017-00913985; Recorded Doc No. 2018000467142 As of the date you file, the claim is: Check all that apply. <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed Nature of lien. Check all that apply. <input type="checkbox"/> An agreement you made (such as mortgage or secured car loan) <input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien) <input checked="" type="checkbox"/> Judgment lien from a lawsuit <input type="checkbox"/> Other (including a right to offset) Date debt was incurred 12/4/2018 Last 4 digits of account number	\$ 0.00 \$235,000.00 \$ 0.00
---	--	---

Add the dollar value of your entries in Column A on this page. Write that number here:
If this is the last page of your form, add the dollar value totals from all pages.
Write that number here:

\$ 0.00

Part 2: List Others to Be Notified for a Debt That You Already Listed

Use this page only if you have others to be notified about your bankruptcy for a debt that you already listed in Part 1. For example, if a collection agency is trying to collect from you for a debt you owe to someone else, list the creditor in Part 1, and then list the collection agency here. Similarly, if you have more than one creditor for any of the debts that you listed in Part 1, list the additional creditors here. If you do not have additional persons to be notified for any debts in Part 1, do not fill out or submit this page.

Debtor 1 **Jamie Lynn Gallian** Case number (if known) **8:21-bk-11710-ES**
First Name Middle Name Last Name

2.6 Lee Gragnano Describe the property that secures the claim: \$ 0.00 \$ 235,000.00 \$ 0.00
Creditor's Name

16062 Warrington Lane
Huntington Beach, CA
92649

Number, Street, City, State & Zip Code

Who owes the debt? Check one.

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim relates to a community debt

16222 Monterey Ln. Unit 376 Huntington Beach, CA 92649 Orange County APN: 891-569-62; LBM1081
Judgment Superior Court of California for the CO of Orange Case No. 30-2017-00913985;
Recorded Doc No. 2018000467142

As of the date you file, the claim is: Check all that apply.

- ☒ Contingent
☒ Unliquidated
☐ Disputed

Nature of lien. Check all that apply.

- ☐ An agreement you made (such as mortgage or secured car loan)
☐ Statutory lien (such as tax lien, mechanic's lien)
☒ Judgment lien from a lawsuit
☐ Other (including a right to offset)

Date debt was incurred **12/4/2018**

Last 4 digits of account number

2.7 Theodore Phillips Describe the property that secures the claim: \$ 0.00 \$ 235,000.00 \$ 0.00
Creditor's Name

17612 Sandra Lee
Huntington Beach, CA
92649

Number, Street, City, State & Zip Code

Who owes the debt? Check one.

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this claim relates to a community debt

16222 Monterey Ln. Unit 376 Huntington Beach, CA 92649 Orange County APN: 891-569-62; LBM1081.
Judgment Superior Court of California for the CO of Orange Case No. 30-2017-00913985;
Recorded Doc No. 2018000467142

As of the date you file, the claim is: Check all that apply.

- ☒ Contingent
☒ Unliquidated
☐ Disputed

Nature of lien. Check all that apply.

- ☐ An agreement you made (such as mortgage or secured car loan)
☐ Statutory lien (such as tax lien, mechanic's lien)
☒ Judgment lien from a lawsuit
☐ Other (including a right to offset)

Date debt was incurred **12/4/2018**

Last 4 digits of account number

Add the dollar value of your entries in Column A on this page. Write that number here:

If this is the last page of your form, add the dollar value totals from all pages.

Write that number here:

\$ 0.00

Part 2: List Others to Be Notified for a Debt That You Already Listed

Use this page only if you have others to be notified about your bankruptcy for a debt that you already listed in Part 1. For example, if a collection agency is trying to collect from you for a debt you owe to someone else, list the creditor in Part 1, and then list the collection agency here. Similarly, if you have more than one creditor for any of the debts that you listed in Part 1, list the additional creditors here. If you do not have additional persons to be notified for any debts in Part 1, do not fill out or submit this page.

Debtor 1 Jamie Lynn Gallian		Case number (if known) 8:21-bk-11710-ES	
<small>First Name Middle Name Last Name</small>			
Huntington Beach Gables			
Homeowners Association			
2.8			
Describe the property that secures the claim:		\$ 9,265.00	\$ 235,000.00
Creditor's Name			
16222 Monterey Ln. Unit 376 Huntington Beach, CA 92649 Orange County APN: 891-569-62; LBM1081			
Judgment Superior Court of California for the CO of Orange Case No. 30-2018-00962999; Recorded Doc No. 2019000148568			
As of the date you file, the claim is: Check all that apply.			
<input type="checkbox"/> Contingent			
<input type="checkbox"/> Unliquidated			
<input checked="" type="checkbox"/> Disputed			
Nature of lien. Check all that apply.			
<input type="checkbox"/> An agreement you made (such as mortgage or secured car loan)			
<input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien)			
<input checked="" type="checkbox"/> Judgment lien from a lawsuit			
<input type="checkbox"/> Other (including a right to offset)			
10200 Willow Creek Rd. Ste. 100 San Diego, CA 92131			
Number, Street, City, State & Zip Code			
Who owes the debt? Check one.			
<input checked="" type="checkbox"/> Debtor 1 only			
<input type="checkbox"/> Debtor 2 only			
<input type="checkbox"/> Debtor 1 and Debtor 2 only			
<input type="checkbox"/> At least one of the debtors and another			
<input type="checkbox"/> Check if this claim relates to a community debt			
Date debt was incurred 03/21/2019		Last 4 digits of account number	
Huntington Beach Gables			
2.9			
Describe the property that secures the claim:		\$ 319,653.59	\$ 235,000.00
Creditor's Name			
16222 Monterey Ln. Unit 376 Huntington Beach, CA 92649 Orange County APN: 891-569-62; LBM1081.			
Judgment Superior Court of California for the CO of Orange Case No. 30-2017-00913985 Recorded Doc No. 2019000165259			
As of the date you file, the claim is: Check all that apply.			
<input type="checkbox"/> Contingent			
<input type="checkbox"/> Unliquidated			
<input type="checkbox"/> Disputed			
Nature of lien. Check all that apply.			
<input type="checkbox"/> An agreement you made (such as mortgage or secured car loan)			
<input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien)			
<input checked="" type="checkbox"/> Judgment lien from a lawsuit			
Other (including a right to offset)			
10200 Willow Creek Rd. Ste. 100 San Diego, CA 92131			
Number, Street, City, State & Zip Code			
Who owes the debt? Check one.			
<input checked="" type="checkbox"/> Debtor 1 only			
<input type="checkbox"/> Debtor 2 only			
<input type="checkbox"/> Debtor 1 and Debtor 2 only			
<input type="checkbox"/> At least one of the debtors and another			
<input type="checkbox"/> Check if this claim relates to a community debt			
Date debt was incurred 5/6/2019		Last 4 digits of account number	

Add the dollar value of your entries in Column A on this page. Write that number here:
If this is the last page of your form, add the dollar value totals from all pages.
Write that number here:

\$ 328,918.59

Part 2: List Others to Be Notified for a Debt That You Already Listed

Use this page only if you have others to be notified about your bankruptcy for a debt that you already listed in Part 1. For example, if a collection agency is trying to collect from you for a debt you owe to someone else, list the creditor in Part 1, and then list the collection agency here. Similarly, if you have more than one creditor for any of the debts that you listed in Part 1, list the additional creditors here. If you do not have additional persons to be notified for any debts in Part 1, do not fill out or submit this page.

Debtor 1 **Jamie Lynn Gallian** Case number (if known) **8:21-bk-11710-ES**
First Name Middle Name Last Name

BS Investors-LP

2.10 Lessor

Creditor's Name

Describe the property that secures the claim:

16222 Monterey Ln. Unit 376 Huntington
Beach, CA 92649 Orange County
APN: 891-569-62; LBM1081

\$ 0.00 \$ 235,000.00 \$ 0.00

18201 Von Karman
Ste. 400
Irvine, CA 92612

Number, Street, City, State & Zip Code

As of the date you file, the claim is: Check all that apply.

☒ Contingent
☒ Unliquidated

☐ Disputed

Nature of lien. Check all that apply.

☐ An agreement you made (such as mortgage or secured car loan)

☐ Statutory lien (such as tax lien, mechanic's lien)

☒ Judgment lien from a lawsuit

☐ Other (including a right to offset)

Who owes the debt? Check one.

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

☐ Check if this claim relates to a community debt

Date debt was incurred 12/12/2019

Last 4 digits of account number

Houser Bros, GP dba Rancho

2.11 Del Rey Mobilehome Estates

Park Manager

Creditor's Name

Describe the property that secures the claim:

16222 Monterey Ln. Unit 376 Huntington
Beach, CA 92649 Orange County
APN: 891-569-62; LBM1081.

\$ 0.00 \$ 235,000.00 \$ 0.00

16222 Monterey Ln, (OFC)
Huntington Beach, CA
92649

Number, Street, City, State & Zip Code

As of the date you file, the claim is: Check all that apply.

☒ Contingent
☒ Unliquidated

☒ Disputed

Nature of lien. Check all that apply.

☐ An agreement you made (such as mortgage or secured car loan)

☐ Statutory lien (such as tax lien, mechanic's lien)

☐ Judgment lien from a lawsuit

☒ Other (including a right to offset)

Who owes the debt? Check one.

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

☐ Check if this claim relates to a community debt

Date debt was incurred

Last 4 digits of account number

Houser Bros Co received post petition CA Covid-19 Rent Relief Funds Award to Debtor on 10/27/2021. Ck No, 58066665, \$ 24301.55. Debtor filed Application For Relief from Forfeiture OCSC ST Court 30-2019-01041423 on 11/8/2021; Refer to Minute Order 11/10/2021-Honorable Sheri Honer, C-66.

Add the dollar value of your entries in Column A on this page. Write that number here:

If this is the last page of your form, add the dollar value totals from all pages.

Write that number here:

\$ 0.00

Part 2: List Others to Be Notified for a Debt That You Already Listed

Use this page only if you have others to be notified about your bankruptcy for a debt that you already listed in Part 1. For example, if a collection agency is trying to collect from you for a debt you owe to someone else, list the creditor in Part 1, and then list the collection agency here. Similarly, if you have more than one creditor for any of the debts that you listed in Part 1, list the additional creditors here. If you do not have additional persons to be notified for any debts in Part 1, do not fill out or submit this page.

Debtor 1 Jamie Lynn Gallian		Case number (if known) 8:21-bk-11710-ES	
<small>First Name Middle Name Last Name</small>			
S 4, A California			
2.12	Limited Partnership.	Describe the property that secures the claim:	
	Tenant	\$ 0.00 \$ 235,000.00 \$ 0.00	
	<small>Creditor's Name</small>	16222 Monterey Ln. Unit 376 Huntington Beach, CA 92649 Orange County APN: 891-569-62; LBM1081	
	1001 Dove Street, Ste. 230	As of the date you file, the claim is: Check all that apply.	
	Newport Beach, CA 92660	<input type="checkbox"/> Contingent	
	<small>Number, Street, City, State & Zip Code</small>	<input type="checkbox"/> Unliquidated	
		<input checked="" type="checkbox"/> Disputed	
Who owes the debt? Check one.		Nature of lien. Check all that apply.	
<input checked="" type="checkbox"/> Debtor 1 only		<input type="checkbox"/> An agreement you made (such as mortgage or secured car loan)	
<input type="checkbox"/> Debtor 2 only		<input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien)	
<input type="checkbox"/> Debtor 1 and Debtor 2 only		<input checked="" type="checkbox"/> Other (including a right to offset)	
<input type="checkbox"/> At least one of the debtors and another		<input type="checkbox"/> Judgment lien from a lawsuit	
<input type="checkbox"/> Check if this claim relates to a community debt			
Date debt was incurred 12/12/2019		Last 4 digits of account number	
<hr/>			
Huntington Beach Gables		Describe the property that secures the claim:	
2.13	Homeowners Association	\$ 46,138.00 \$235,000.00 \$	
	Gorden, Rees, Skully	16222 Monterey Ln. Unit 376 Huntington Beach, CA 92649 Orange County APN: 891-569-62; LBM1081.	
	Mansukhani, APC	Judgment Superior Court of California for the CO of Orange Case No. 30-2017-00913985 Recorded Doc No. 2018000467412	
	<small>Creditor's Name</small>	As of the date you file, the claim is: Check all that apply.	
	633 W. 5th Street	<input checked="" type="checkbox"/> Contingent	
	52 FL	<input checked="" type="checkbox"/> Unliquidated	
	Los Angeles, CA	<input type="checkbox"/> Disputed	
	90071-2005	Nature of lien. Check all that apply.	
	<small>Number, Street, City, State & Zip Code</small>	<input type="checkbox"/> An agreement you made (such as mortgage or secured car loan)	
Who owes the debt? Check one.		<input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien)	
<input checked="" type="checkbox"/> Debtor 1 only		<input checked="" type="checkbox"/> Judgment lien from a lawsuit	
<input type="checkbox"/> Debtor 2 only		Other (including a right to offset)	
<input type="checkbox"/> Debtor 1 and Debtor 2 only			
<input type="checkbox"/> At least one of the debtors and another			
<input type="checkbox"/> Check if this claim relates to a community debt			
Date debt was incurred 12/4/2018		Last 4 digits of account number	
<hr/>			
Add the dollar value of your entries in Column A on this page. Write that number here:		\$ 46,138.00	
If this is the last page of your form, add the dollar value totals from all pages. Write that number here:			

Part 2: List Others to Be Notified for a Debt That You Already Listed

Use this page only if you have others to be notified about your bankruptcy for a debt that you already listed in Part 1. For example, if a collection agency is trying to collect from you for a debt you owe to someone else, list the creditor in Part 1, and then list the collection agency here. Similarly, if you have more than one creditor for any of the debts that you listed in Part 1, list the additional creditors here. If you do not have additional persons to be notified for any debts in Part 1, do not fill out or submit this page.

Debtor 1 Jamie Lynn Gallian		Case number (if known) 8:21-bk-11710-ES	
First Name Middle Name Last Name			
Huntington Beach Gables			
2.14 Homeowners Association	Describe the property that secures the claim: \$ 319,653.19 \$ 235,000.00 \$		
Creditor's Name	16222 Monterey Ln. Unit 376 Huntington Beach, CA 92649 Orange County APN: 891-569-62; LBM1081		
	Judgment Superior Court of California for the CO of Orange Case No. 30-2017-00913985		
	Recorded Doc No. 2019000166068		
10200 Willow Creek Rd. Ste. 100 San Diego, CA 92131	As of the date you file, the claim is: Check all that apply.		
Number, Street, City, State & Zip Code	<input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input checked="" type="checkbox"/> Disputed		
Who owes the debt? Check one.	Nature of lien. Check all that apply.		
<input checked="" type="checkbox"/> Debtor 1 only	<input type="checkbox"/> An agreement you made (such as mortgage or secured car loan)		
<input type="checkbox"/> Debtor 2 only	<input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien)		
<input type="checkbox"/> Debtor 1 and Debtor 2 only	<input checked="" type="checkbox"/> Judgment lien from a lawsuit		
<input type="checkbox"/> At least one of the debtors and another	<input type="checkbox"/> Other (including a right to offset)		
<input type="checkbox"/> Check if this claim relates to a community debt	Abstract Released by Gables HOA 9/10/2020 OC CLK REC. Doc No. 20200000481922		
Date debt was incurred N/A	Last 4 digits of account number		
Huntington Beach Gables			
2.15 Homeowners Association	Describe the property that secures the claim: \$ 3,070.00 \$235,000.00 \$		
Creditor's Name	16222 Monterey Ln. Unit 376 Huntington Beach, CA 92649 Orange County APN: 891-569-62; LBM1081.		
	Judgment Superior Court of California for the CO of Orange Case No. 30-2017-00913985		
	Recorded Doc No. 2018000435011		
10200 Willow Creek Rd. Ste. 100 San Diego, CA 92131	As of the date you file, the claim is: Check all that apply.		
Number, Street, City, State & Zip Code	<input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed		
Who owes the debt? Check one.	Nature of lien. Check all that apply.		
<input checked="" type="checkbox"/> Debtor 1 only	<input type="checkbox"/> An agreement you made (such as mortgage or secured car loan)		
<input type="checkbox"/> Debtor 2 only	<input type="checkbox"/> Statutory lien (such as tax lien, mechanic's lien)		
<input type="checkbox"/> Debtor 1 and Debtor 2 only	<input checked="" type="checkbox"/> Judgment lien from a lawsuit		
<input type="checkbox"/> At least one of the debtors and another	<input type="checkbox"/> Other (including a right to offset)		
<input type="checkbox"/> Check if this claim relates to a community debt			
Date debt was incurred 9/27/2018	Last 4 digits of account number		
Add the dollar value of your entries in Column A on this page. Write that number here: \$ 322,723.19			
If this is the last page of your form, add the dollar value totals from all pages. Write that number here:			

Part 2: List Others to Be Notified for a Debt That You Already Listed

Use this page only if you have others to be notified about your bankruptcy for a debt that you already listed in Part 1. For example, if a collection agency is trying to collect from you for a debt you owe to someone else, list the creditor in Part 1, and then list the collection agency here. Similarly, if you have more than one creditor for any of the debts that you listed in Part 1, list the additional creditors here. If you do not have additional persons to be notified for any debts in Part 1, do not fill out or submit this page.

Debtor 1 **Jamie Lynn Gallian** Case number (if known) **8:21-bk-11710-ES**
First Name Middle Name Last Name

2.16 **People of the State of California**
Creditor's Name

**8141 13th Street
Westminister, CA
92683**

Number, Street, City, State & Zip Code

Describe the property that secures the claim:

**16222 Monterey Ln. Unit 376 Huntington
Beach, CA 92649 Orange County
APN: 891-569-62; LBM1081**

**Judgment Superior Court of California for
the CO of Orange Case No.
18WM05278;**

Recorded Doc No. 2021000348287

As of the date you file, the claim is: Check all that apply.

☐ Contingent
☐ Unliquidated

☒ Disputed

Nature of lien. Check all that apply.

☐ An agreement you made (such as mortgage or secured car loan)

☐ Statutory lien (such as tax lien, mechanic's lien)

☒ Judgment lien from a lawsuit

☒ Other (including a right to offset)

Less Debtor Paid Fine & Fees pursuant to CT Order 12/12/2019 @ WJC

\$ **13,229.34** \$ **235,000.00** \$

Who owes the debt? Check one.

☒ Debtor 1 only

☐ Debtor 2 only

☐ Debtor 1 and Debtor 2 only

☐ At least one of the debtors and another

☐ Check if this claim relates to a community debt

Date debt was incurred **12/12/19; 1/20/21**

Last 4 digits of account number

2.17 **Janine Jasso**
Creditor's Name

**16025 Warmington Ln
Huntington Beach, CA
92649**

Number, Street, City, State & Zip Code

Describe the property that secures the claim:

**16222 Monterey Ln. Unit 376 Huntington
Beach, CA 92649 Orange County
APN: 891-569-62; LBM1081.**

**Judgment Superior Court of California for
the CO of Orange Case No.
18WM05278;**

Recorded Doc No. 2021000348287

As of the date you file, the claim is: Check all that apply.

☐ Contingent

☐ Unliquidated

☐ Disputed

Nature of lien. Check all that apply.

☐ An agreement you made (such as mortgage or secured car loan)

☐ Statutory lien (such as tax lien, mechanic's lien)

☒ Judgment lien from a lawsuit

☒ Other (including a right to offset)

Civil Attorney Fees 6785 with Misc

Less Debtor Paid Fine & Fees pursuant to CT Order 12/12/2019 @ WJC

\$ **13,229.34** \$ **235,000.00** \$

Date debt was incurred **1/20/2021**

Last 4 digits of account number

Add the dollar value of your entries in Column A on this page. Write that number here:
If this is the last page of your form, add the dollar value totals from all pages.
Write that number here:

\$ **26,458.68**

Part 2: List Others to Be Notified for a Debt That You Already Listed

Use this page only if you have others to be notified about your bankruptcy for a debt that you already listed in Part 1. For example, if a collection agency is trying to collect from you for a debt you owe to someone else, list the creditor in Part 1, and then list the collection agency here. Similarly, if you have more than one creditor for any of the debts that you listed in Part 1, list the additional creditors here. If you do not have additional persons to be notified for any debts in Part 1, do not fill out or submit this page.

EXHIBIT 12

STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES, AND HOUSING

GAVIN NEWSOM, Governor

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS



Title Search

Date Printed: Jan 18, 2019

Decal #:	LBM1081	Use Code:	SFD
Manufacturer:	SKYLINE HOMES INC	Original Price Code:	BVH
Tradename:	CUSTOM VILLA	Rating Year:	
Model:		Tax Type:	LPT
Manufactured Date:	05/29/2014	Last ILT Amount:	
Registration Exp:		Date ILT Fees Paid:	
First Sold On:	07/28/2014	ILT Exemption:	NONE

Serial Number	HUD Label / Insignia	Length	Width
AC7V710394GA	PFS1130282	60'	15' 2"
AC7V710394GB	PFS1130281	56'	15' 2"

Registered Owner:

J-SANDCASTLE CO LLC
16222 MONTEREY LANE ROOM 376
HUNTINGTON BEACH, CA 92649

Last Title Date: 09/10/2014

Last Reg Card: Pending Reg Card

Sale/Transfer Info: Price \$175,000.00 Transferred on 11/01/2018

Situs Address:

16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649
Situs County: ORANGE

END OF TITLE SEARCH

EXHIBIT 13

STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
CERTIFICATE OF TITLE

Manufactured Home

Decal No: LBM1081

Manufacturer ID/Name		Trade Name		Model		DOM		DFS		RY	Exp. Date	
90002 SKYLINE HOMES INC		CUSTOM VILLA				05/29/2014		07/28/2014				
Serial Number		Label/Insignia Number		Weight	Length	Width	SPC	SCC	Exempt	Use	Type	
AC7V710394GB AC7V710394GA		PFS1130281 PFS1130282		22,383 25,068	56' 60'	15' 2" 15' 2"		30		SFD	LPT	
								Issued Sep 10, 2014		Total Fees Paid \$91.00		

Addressee

LISA T RYAN
16222 MONTEREY LN 376
HUNTINGTON BEACH, CA 92649

Registered Owner(s)

LISA T RYAN
16222 MONTEREY LN 376
HUNTINGTON BEACH, CA 92649

Situs Address

16222 MONTEREY LN 376
HUNTINGTON BEACH, CA 92649

IMPORTANT
THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT.
THE CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

DTN: 8169431

NOV 16 2018

09102014 - 244

SECTION A - SMOKE DETECTOR AND WATER HEATER SEISMIC BRACING CERTIFICATION

California Health and Safety Code (HSC) Sections 18029.6 and 18031.7 require that on the date of transfer of title all used manufactured homes, used mobilehomes, and used multifamily manufactured homes: 1) be equipped with an operable smoke detector in each room designed for sleeping, and 2) all fuel-gas-burning water heater appliances be seismically braced, anchored, or strapped pursuant to existing codes. A declaration may be signed within 45 days prior to the date of transfer of title stating that these requirements have been met.

I/We further agree to indemnify and save harmless the Director of the State of California, Department of Housing and Community Development, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the unit in California or from issuance of a California Certificate of Title covering the same. I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 11/1/2018 at Huntington Beach, CA
Signature [Signature] State CA
Printed Name LISA T RYAN

SECTION B - RELEASING SIGNATURES

1a. [Signature] Date of Release 11/1/2018
Releasing Signature of Registered Owner
1b. [Signature] Date of Release _____
Releasing Signature of Registered Owner
2. [Signature] ☒ Release ☐ Retain ☐ Assign Interest
Legal Owner of Record (If any) sign and check appropriate box
(* If Assign Interest is checked - Complete New Legal Owner Below)

SECTION C - NEW OWNER INFORMATION

NEW REGISTERED OWNER - Please Print or Type Clearly

3a. J-Sandcastle Co, LLC 3c. _____
New Registered Owners Name New Registered Owners Name
3b. _____ 3d. _____
New Registered Owners Name New Registered Owners Name
If more than one New Owner going onto title, please check the appropriate Co-owner term box.
☐ Joint Tenants with Right of Survivorship ☐ Tenants In Common OR ☐ Trust/Trustee(s)
☐ Tenants In Common AND ☐ Community Property ☐ Community Property with Right of Survivorship
(* If this box is checked-Complete HCD 476.6B)
4. 16222 Monterey Ln # 376 Huntington Beach CA 92649
Mailing Address of New Registered Owner City/State Zip Code
5. Same as Above
Actual Location Address of Unit City/State Zip Code
6. # 225,000 / 175,000 11-1-18
Purchase Price or check box if Gift- ☐ Purchase Date or Transfer Date
7a. J-Sandcastle Co, LLC [Signature] Signature of New Registered Owners
7b. _____ Signature of New Registered Owners
7c. _____ Signature of New Registered Owners
7d. _____ Signature of New Registered Owners

NEW LEGAL OWNER - Please Print or Type Clearly

8a. _____ 8b. _____
New Legal Owners Name New Legal Owners Name
If more than one New Lender going onto title, please check the appropriate Co-owner term box below.
☐ Joint Tenants with Right of Survivorship ☐ Tenants In Common OR ☐ Trust/Trustee(s)
☐ Tenants In Common AND ☐ Community Property ☐ Community Property with Right of Survivorship
(* If this box is checked-Complete HCD 476.6B)
9. _____
Mailing Address of New Legal Owner City/State Zip Code

NEW JUNIOR LIENHOLDER - Please Print or Type Clearly

10a. _____ 10b. _____
New Junior Lienholder Name New Junior Lienholder Name
11. _____
Mailing Address of New Junior Lienholder City/State Zip Code

SECTION D - RELEASE OF DEALERS

12. _____
Signature of Selling Dealer Print Dealers Name and Dealer Number

EXHIBIT 14

State of California
BUSINESS, TRANSPORTATION AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM
PO Box 2111 Sacramento CA 95812-2111
1 800 952-8356
www.hcd.ca.gov



NOTICE OF SALE OR TRANSFER

ATTENTION: THIS FORM IS TO BE USED ONLY WHEN YOU SELL OR TRANSFER YOUR MOBILEHOME OR COMMERCIAL COACH. AT THAT TIME COMPLETE, SIGN, AND RETURN TO THE ADDRESS STATED ABOVE TO REPORT THE CHANGE OF OWNERSHIP.

SECTION I: Enter the following information that describes your unit: Decal/License plate number(s), Serial(s) number, and Trade name of Unit.

SECTION II: Enter the sale price and the date of sale/transfer including the month, day, and year.

SECTION III: Enter the full name and mailing address of the new owner/buyer(s).

SECTION IV: Enter date, city, and state indicating where and when this form is being executed. SELLER(S) MUST SIGN and print their names(s).

SECTION I. DESCRIPTION OF UNIT		
Decal Number(s)	Serial Number(s)	Trade Name
LBM1081	AC7V710394GB AC74710394GA	Custom Villa

SECTION II. SALE OR TRANSFER INFORMATION	
For the sum of \$ <u>225,000</u>	the receipt of which is hereby acknowledged, I/we did sell, transfer and deliver to the purchaser/owner named below, on <u>11-1-18</u> my/our right title and interest in the unit described above.
Date of Transfer	

SECTION III. NAME OF PURCHASER/NEW OWNER:			
Name: <u>J-Sundcastle Co, LLC</u>			
Address: <u>5782 PINON Dr.</u>			
City: <u>Huntington Bch</u>	State: <u>CA</u>	Zip Code: <u>92649</u>	

SECTION IV. CERTIFICATION AND RELEASE

I/we certify under penalty of perjury under the laws of the State of California that: 1) I/We are the lawful owner(s) of the unit, and 2) I/We have the right to sell it, and 3) I/We guarantee and will defend the title to the unit against the claims and demands of any and all persons arising prior to this date, and 4) the unit is free of all liens and encumbrances.

I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed On 11/1/2018 at Huntington Beach CA
Date City State
Signature of Sellers: [Signature] [Signature] 11/15/2018
Printed Name: LISA T RYAN

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
County of Orange)
On November 15, 2018 before me, Brandon Vargas, Notary Public
Date Here Insert Name and Title of the Officer
personally appeared Lisa Theresa Ryan
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature Brandon Vargas
Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: Department of Housing and Community Development Certificate of Title, Section B
Document Date: _____ Number of Pages: 3
Signer(s) Other Than Named Above: _____

EXHIBIT 15

STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING

GAVIN NEWSOM, Governor

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS



Title Search

Date Printed: Jul 23, 2020

Decal #:	LBM1081	Use Code:	SFD
Manufacturer:	SKYLINE HOMES INC	Original Price Code:	BVH
Tradename:	CUSTOM VILLA	Rating Year:	
Model:		Tax Type:	LPT
Manufactured Date:	05/29/2014	Last ILT Amount:	
Registration Exp:		Date ILT Fees Paid:	
First Sold On:	07/28/2014	ILT Exemption:	NONE

Serial Number	HUD Label / Insignia	Length	Width
AC7V710394GA	PFS1130282	60'	15' 2"
AC7V710394GB	PFS1130281	56'	15' 2"

Registered Owner:

J-SANDCASTLE CO LLC
16222 MONTEREY LANE ROOM 376
HUNTINGTON BEACH, CA 92649

Last Title Date: 01/19/2019

Last Reg Card: 01/19/2019

Sale/Transfer Info: Price \$175,000.00 Transferred on 11/01/2018

Situs Address:

16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649
Situs County: ORANGE

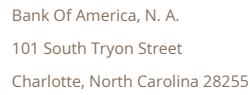
Title Searches:

JANINE JASSO
PO BOX 370161
EL PASO, TX 79937

Title File No: LBM1081

END OF TITLE SEARCH

EXHIBIT 16



EDD Debit Card

Customer Service:	866-692-9374
Card Number:	**** * 7357
Period Start Date:	12/13/2020
Period End Date:	01/12/2021

Summary of Transactions

Account Transaction Activity

Summary of Fees

[illegible]

Summary of Fees

Fees for Current Statement	Year-To-Date Fees
\$	\$

Privacy Notice - Federal law requires us to tell you how we collect, share, and protect your personal information. Our privacy policy has not changed and you may review our policy and practices with respect to your personal information at www.bankofamerica.com/prepaidprivacynotice or we will mail you a free copy upon request if you call us at (855) 333-4896 (English), (855) 355-5057 (Spanish).

CARDHOLDERS WHO RECEIVE MONTHLY ACCOUNT STATEMENTS BY MAIL

In Case of Errors or Questions About Your Electronic Transfers:

Telephone us at (866) 692-9374, (866) 656-5913 TTY, or (423) 262-1650 (Collect when calling outside the U.S.), or write to us at Bank of America, P.O. Box 8488, Gray, TN 37615-8488.

Call or write us as soon as you can if you think your statement or receipt is wrong or if you need more information about a transfer on the statement or receipt. We must hear from you no later than 60 days after we sent you the FIRST statement on which the error or problem appeared:

1. Tell us your name and Account number.
2. Describe the error or the transfer you are unsure about, and explain as clearly as you can why you believe it is an error or why you need more information.
3. Tell us the dollar amount of the suspected error.

We will investigate your complaint and will correct any error promptly. If we take more than 10 business days to do this, we will credit your Account for the amount you think is in error, so that you will have the use of the money during the time it takes us to complete our investigation.

CARDHOLDERS WHO DO NOT RECEIVE MONTHLY ACCOUNT STATEMENTS BY MAIL

In Case of Errors or Questions About Your Electronic Transfers:

Telephone us at (866) 692-9374, (866) 656-5913 TTY, or (423) 262-1650 (Collect when calling outside the U.S.), or write to us at Bank of America, P.O. Box 8488, Gray, TN 37615-8488.

Call or write us as soon as you can if you think in your statement or receipt is wrong or if you need more information about a transfer on the statement or receipt. We must hear from you no later than 60 days after the earlier of the date you electronically access your Account, if the error could be viewed in your electronic history, or the date we sent the FIRST written history on which the error appeared; but in any event you must report the error no more than 120 days after the transaction allegedly in error was credited or debited to your Account:

Bank Of America, N. A.
101 South Tryon Street
Charlotte, North Carolina 28255

Statement for March 12, 2021

EDD Debit Card

Forward Service Requested

JAMIE L GALLIAN
16222 MONTEREY LN SPC 376
HUNTINGTON BH, CA 92649-0000

Customer Service:	866-692-9374
Card Number:	**** * 7357
Period Start Date:	02/13/2021
Period End Date:	03/12/2021

Summary of Transactions

Previous Balance	(+) Credits and Adjustments	(-) Purchases and Adjustments	New Balance
\$			

Account Transaction Activity

[illegible]

Merchant Name	Posted Date	Reference Number	Transaction Details	Credit	Debit
DEPT OF HOUSING/COMMUNITY 916-3239252, California 95833 United States of America	02/18/2021	104925640490	Purchase of Goods or Services		\$ -81.00
DEPT OF HOUSING/COMMUNITY 916-3239252, California 95833 United States of America	02/18/2021	104925640490	Purchase of Goods or Services		\$ -81.00

Merchant Name	Posted Date	Reference Number	Transaction Details	Credit	Debit
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
Totals				\$ [REDACTED]	[REDACTED]

Summary of Fees

Fees for Current Statement	Year-To-Date Fees
\$ [REDACTED]	\$ [REDACTED]

Privacy Notice - Federal law requires us to tell you how we collect, share, and protect your personal information. Our privacy policy has not changed and you may review our policy and practices with respect to your personal information at www.bankofamerica.com/prepaidprivacynotice or we will mail you a free copy upon request if you call us at (855) 333-4896 (English), (855) 355-5057 (Spanish).

CARDHOLDERS WHO RECEIVE MONTHLY ACCOUNT STATEMENTS BY MAIL

In Case of Errors or Questions About Your Electronic Transfers:

Telephone us at (866) 692-9374, (866) 656-5913 TTY, or (423) 262-1650 (Collect when calling outside the U.S.), or write to us at Bank of America, P.O. Box 8488, Gray, TN 37615-8488.

Call or write us as soon as you can if you think your statement or receipt is wrong or if you need more information about a transfer on the statement or receipt. We must hear from you no later than 60 days after we sent you the FIRST statement on which the error or problem appeared:

1. Tell us your name and Account number.
2. Describe the error or the transfer you are unsure about, and explain as clearly as you can why you believe it is an error or why you need more information.
3. Tell us the dollar amount of the suspected error.

We will investigate your complaint and will correct any error promptly. If we take more than 10 business days to do this, we will credit your Account for the amount you think is in error, so that you will have the use of the money during the time it takes us to complete our investigation.

CARDHOLDERS WHO DO NOT RECEIVE MONTHLY ACCOUNT STATEMENTS BY MAIL

In Case of Errors or Questions About Your Electronic Transfers:

Telephone us at (866) 692-9374, (866) 656-5913 TTY, or (423) 262-1650 (Collect when calling outside the U.S.), or write to us at Bank of America, P.O. Box 8488, Gray, TN 37615-8488.

Call or write us as soon as you can if you think in your statement or receipt is wrong or if you need more information about a transfer on the statement or receipt. We must hear from you no later than 60 days after the earlier of the date you electronically access your Account, if the error could be viewed in your electronic history, or the date we sent the FIRST written history on which the error appeared; but in any event you must report the error no more than 120 days after the transaction allegedly in error was credited or debited to your Account:

1. Tell us your name and Account number.
2. Describe the error or the transfer you are unsure about, and explain as clearly as you can why you believe it is an error or why you need more information.
3. Tell us the dollar amount of the suspected error.

We will investigate your complaint and will correct any error promptly. If we take more than 10 business days to do this, we will credit your Account for the amount you think is in error, so that you will have the use of the money during the time it takes us to complete our investigation.

eCommunications

You may request that rather than receiving your monthly Account statement or notices by mail, you can review them on this website. Monthly Account statements posted to this website will be available for at least 12 months.

You can withdraw this request to not receive your monthly Account statement or notices by mail by calling us at (866) 692-9374. You may also obtain copies of your statements by calling us at (866) 692-9374. A fee may apply for copies.

[illegible]

Summary of Fees

Fees for Current Statement	Year-To-Date Fees
\$	\$

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CARDHOLDERS WHO RECEIVE MONTHLY ACCOUNT STATEMENTS BY MAIL

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Telephone us at (866) 692-9374, (866) 656-5913 TTY, or (423) 262-1650 (Collect when calling outside the U.S.), or write to us at Bank of America, P.O. Box 8488, Gray, TN 37615-8488.

Call or write us as soon as you can if you think your statement or receipt is wrong or if you need more information about a transfer on the statement.

Merchant Name	Posted Date	Reference Number	Transaction Details	Credit	Debit
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
Totals				\$ [REDACTED]	[REDACTED] 4

Summary of Fees

Fees for Current Statement	Year-To-Date Fees
\$ [REDACTED]	\$ [REDACTED]

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3. Tell us the dollar amount of the suspected error.

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Bank Of America, N. A.
101 South Tryon Street
Charlotte, North Carolina 28255

Statement for June 12, 2021

EDD Debit Card

Forward Service Requested

JAMIE L GALLIAN
16222 MONTEREY LN SPC 376
HUNTINGTON BH, CA 92649-0000

Customer Service: 866-692-9374
Card Number: **** * 7357
Period Start Date: 05/13/2021
Period End Date: 06/12/2021

Summary of Transactions

Previous Balance	(+) Credits and Adjustments	(-) Purchases and Adjustments	New Balance
\$ [REDACTED]	[REDACTED]	[REDACTED]	\$ [REDACTED]

Account Transaction Activity

Merchant Name	Posted Date	Reference Number	Transaction Details	Credit	Debit
ALBERTSONS #080 ALBERTSONS #080 HUNTINGTON BE, California 92649 United [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]

[illegible]

Summary of Fees

Fees for Current Statement	Year-To-Date Fees
\$	\$



Bank Of America, N. A.
101 South Tryon Street
Charlotte, North Carolina 28255

Statement for July 12, 2021

EDD Debit Card

Forward Service Requested

JAMIE L GALLIAN
16222 MONTEREY LN SPC 376
HUNTINGTON BH, CA 92649-0000

Customer Service:	866-692-9374
Card Number:	**** * 7357
Period Start Date:	06/13/2021
Period End Date:	07/12/2021

Summary of Transactions

Previous Balance	(+) Credits and Adjustments	(-) Purchases and Adjustments	New Balance
\$	\$	\$	\$

Account Transaction Activity

Merchant Name	Posted Date	Reference Number	Transaction Details	Credit	Debit
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]			[REDACTED]		
Totals				\$ [REDACTED]	[REDACTED] 48

Summary of Fees

Fees for Current Statement	Year-To-Date Fees
\$ <input type="text"/>	\$ <input type="text"/>

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Bank Of America, N. A.
101 South Tryon Street
Charlotte, North Carolina 28255

Statement for August 12, 2021

EDD Debit Card

Forward Service Requested

JAMIE L GALLIAN
16222 MONTEREY LN SPC 376
HUNTINGTON BH, CA 92649-0000

Customer Service: 866-692-9374
Card Number: **** * 7357
Period Start Date: 07/13/2021
Period End Date: 08/12/2021

Summary of Transactions

Previous Balance	(+) Credits and Adjustments	(-) Purchases and Adjustments	New Balance
\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]

Account Transaction Activity

Merchant Name	Posted Date	Reference Number	Transaction Details	Credit	Debit
DEPT OF HOUSING/COMMUNITY 916-3239252, California 95833 United States of America	08/11/2021	122320642230	Purchase of Goods or Services		\$ -81.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
DEPT OF HOUSING/COMMUNITY 916-3239252, California 95833 United States of America	08/05/2021	121725642170	Purchase of Goods or Services		\$ -35.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]

Merchant Name	Posted Date	Reference Number	Transaction Details	Credit	Debit
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
DEPT OF HOUSING/COMMUNITY 916-3239252, California 95833 United States of America	07/28/2021	120921642090	Purchase of Goods or Services		\$ -35.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
DEPT OF HOUSING/COMMUNITY 916-3239252, California 95833 United States of America	07/27/2021	120826642080	Purchase of Goods or Services		\$ -35.00
DEPT OF HOUSING/COMMUNITY 916-3239252, California 95833 United States of America	07/27/2021	120825642080	Purchase of Goods or Services		\$ -35.00
DEPT OF HOUSING/COMMUNITY 916-3239252, California 95833 United States of America	07/27/2021	120827642080	Purchase of Goods or Services		\$ -35.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]

Merchant Name	Posted Date	Reference Number	Transaction Details	Credit	Debit
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
DEPT OF HOUSING/COMMUNITY 916-3239252, California 95833 United States of America	07/20/2021	120127642010	Purchase of Goods or Services		\$ -25.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
DEPT OF HOUSING/COMMUNITY 916-3239252, California 95833 United States of America	07/17/2021	119824641980	Purchase of Goods or Services		\$ -116.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]		[REDACTED]
Totals				[REDACTED]	[REDACTED] 30

Summary of Fees

Fees for Current Statement	Year-To-Date Fees
\$ [REDACTED]	\$ [REDACTED]

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101 South Tryon Street
Charlotte, North Carolina 28255

EDD Debit Card

Forward Service Requested

JAMIE L GALLIAN
16222 MONTEREY LN SPC 376
HUNTINGTON BH, CA 92649-0000

Customer Service:	866-692-9374
Card Number:	**** * 7357
Period Start Date:	08/13/2021
Period End Date:	09/12/2021

Summary of Transactions

Previous Balance	(+) Credits and Adjustments	(-) Purchases and Adjustments	New Balance
\$	\$	\$	\$

Account Transaction Activity

[illegible]

Summary of Fees

Fees for Current Statement	Year-To-Date Fees
\$ <input type="text"/>	\$ <input type="text"/>

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Call _____



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16222 MONTEREY LN SPC 376
HUNTINGTON BH, CA 92649-0000

Customer Service:	866-692-9374
Card Number:	**** * 7357
Period Start Date:	09/13/2021
Period End Date:	10/12/2021

Summary of Transactions

Previous Balance	(+) Credits and Adjustments	(-) Purchases and Adjustments	New Balance
\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]

Account Transaction Activity

Merchant Name	Posted Date	Reference Number	Transaction Details	Credit	Debit
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
XXXXXXXXXXXXXXXXXXXX	07/08/2024	1234567890	XXXXXXXXXX XXXXXXXXXX		100.00
Totals				1000.00	\$1000.00

Summary of Fees

Fees for Current Statement	Year-To-Date Fees
\$	\$

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EXHIBIT 17

STATE OF CALIFORNIA - BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS

GAVIN NEWSOM, Governor



Title Search

Date Printed: Jun 7, 2021

Decal #: LBM1081 Use Code: SFD
Manufacturer: SKYLINE HOMES INC Original Price Code: BVH
Tradename: CUSTOM VILLA Rating Year:
Model: Tax Type: LPT
Manufactured Date: 05/29/2014 Last ILT Amount:
Registration Exp: Date ILT Fees Paid:
First Sold On: 07/28/2014 ILT Exemption: NONE

Serial Number	HUD Label / Insignia	Length	Width
AC7V710394GA	PFS1130282	60'	15' 2"
AC7V710394GB	PFS1130281	56'	15' 2"

Registered Owner:

J-SANDCASTLE CO LLC
16222 MONTEREY LANE ROOM 376
HUNTINGTON BEACH, CA 92649

Last Title Date: 02/24/2021

Last Reg Card: 02/24/2021

Sale/Transfer Info: Price \$175,000.00 Transferred on 11/01/2018

Situs Address:

16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649
Situs County: ORANGE

Legal Owner:

RONALD J PIERPONT
JPAD LLC
Tenants in Common Or
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

Lien Perfected On: 08/20/20 11:58:00

Title Searches:

JANINE JASSO
PO BOX 370161
EL PASO, TX 79937

Title File No: LBM1081

END OF TITLE SEARCH

EXHIBIT 18



Title Search

Date Printed: Aug 10, 2021

Decal #:	LBM1081	Use Code:	SFD
Manufacturer:	SKYLINE HOMES INC	Original Price Code:	BVH
Tradename:	CUSTOM VILLA	Rating Year:	
Model:		Tax Type:	LPT
Manufactured Date:	05/29/2014	Last ILT Amount:	
Registration Exp:		Date ILT Fees Paid:	
First Sold On:	07/28/2014	ILT Exemption:	NONE

Serial Number	HUD Label / Insignia	Length	Width
AC7V710394GA	PFS1130282	60'	15' 2"
AC7V710394GB	PFS1130281	56'	15' 2"

Record Conditions:

- An application for title or registration change is pending with the department. For information regarding this application, please call 1-800-952-8356 and request to speak with a customer representative.

Registered Owner:

JAMIE LYNN GALLIAN
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

Last Title Date: 08/03/2021

Last Reg Card: 08/03/2021

Sale/Transfer Info: Price \$.00 Transferred on 02/25/2021

Situs Address:

16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649
Situs County: ORANGE

Title Searches:

JANINE JASSO
PO BOX 370161
EL PASO, TX 79937

Title File No: LBM1081

JAMIE GALLIAN
16222 MONTEREY LANE SPACE 376
HUNTINGTN BCH, CA 92649

Title File No: LBM1081

JAMIE GALLIAN
16222 MONTEREY LANE SPACE 376
HUNTINGTN BCH, CA 92649

Title File No: LBM1081

HOUSER BROS. CO.
16222 MONTEREY LN OFC
HUNTINGTON BEACH, CA 92649

Title File No: LBM1081

JAMIE GALLIAN
16222 MONTEREY LANE SPACE 376
HUNTINGTN BCH, CA 92649

Title File No: LBM1081

JAMIE GALLIAN
16222 MONTEREY LANE SPACE 376
HUNTINGTN BCH, CA 92649

Title File No: LBM1081

JAMIE GALLIAN
16222 MONTEREY LANE SPACE 376
HUNTINGTN BCH, CA 92649

Title File No: LBM1081

END OF TITLE SEARCH

Page Number:2

EXHIBIT 19

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS

Title Search

Date Printed: Sep 21, 2021

Decal #:	LBM1081	Use Code:	SFD
Manufacturer:	SKYLINE HOMES INC	Original Price Code:	BVH
Tradename:	CUSTOM VILLA	Rating Year:	
Model:		Tax Type:	LPT
Manufactured Date:	05/29/2014	Last ILT Amount:	
Registration Exp:		Date ILT Fees Paid:	
First Sold On:	07/28/2014	ILT Exemption:	NONE

Serial Number	HUD Label / Insignia	Length	Width
AC7V710394GA	PFS1130282	60'	15' 2"
AC7V710394GB	PFS1130281	56'	15' 2"

Registered Owner:

JAMIE LYNN GALLIAN
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

Last Title Date: 08/12/2021

Last Reg Card: 08/12/2021

Sale/Transfer Info: Price \$.00 Transferred on 02/25/2021

Situs Address:

16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649
Situs County: ORANGE

Legal Owner:

J-PAD LLC
21742 ANZA AVE
TORRANCE, CA 90503

Lien Perfected On: 01/14/19 15:22:00

Title Searches:

JANINE JASSO
PO BOX 370161
EL PASO, TX 79937

Title File No: LBM1081

JAMIE GALLIAN
16222 MONTEREY LANE SPACE 376
HUNTINGTN BCH, CA 92649

Title File No: LBM1081

JAMIE GALLIAN
16222 MONTEREY LANE SPACE 376
HUNTINGTN BCH, CA 92649

Title File No: LBM1081

HOUSER BROS. CO.
16222 MONTEREY LN OFC
HUNTINGTON BEACH, CA 92649

Title File No: LBM1081

JAMIE GALLIAN
16222 MONTEREY LANE SPACE 376
HUNTINGTN BCH, CA 92649

Title File No: LBM1081

JAMIE GALLIAN
16222 MONTEREY LANE SPACE 376
HUNTINGTN BCH, CA 92649

Title File No: LBM1081

JAMIE GALLIAN
16222 MONTEREY LANE SPACE 376
HUNTINGTN BCH, CA 92649

Title File No: LBM1081

END OF TITLE SEARCH

Page Number:2

EXHIBIT 20



DTN: 12153896

Decal: LBM1081

Unit ID: 252606085

Trans Type: L/O Assignment

Trans Date: 02/01/2021

Trade Name: CUSTOM VILLA

Serial #: AC7V710394GA, AC7V710394GB

Insignia # PFS1130281, PFS1130282

Status Date: 02/23/2021 User Name: SHAH, KIRAN

**STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
CERTIFICATE OF TITLE**

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name 90002 SKYLINE HOMES INC	Trade Name CUSTOM VILLA	Model ..	DOM 05/29/2014	DFS 07/28/2014	RY
Serial Number AC7V710394GB AC7V710394GA	Label/Insignia Number PFS1130281 PFS1130282	Weight 22,383 25,068	Length 56' 60'	Width 15' 2" 15' 2"	Issued Jan 19, 2019

Addressee

J-SANDCASTLE CO LLC
16222 MONTEREY LANE ROOM 376
HUNTINGTON BEACH, CA 92649

Registered Owner(s)

J-SANDCASTLE CO LLC
16222 MONTEREY LANE ROOM 376
HUNTINGTON BEACH, CA 92649

Situs Address

16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

IMPORTANT

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

DTN: 10670236

01192019 - 2

SECTION A - SMOKE DETECTOR AND WATER HEATER SEISMIC BRACING CERTIFICATION

California Health and Safety Code (HSC) Sections 18029.6 and 18031.7 require that on the date of transfer of title all used manufactured homes, used mobilehomes, and used multifamily manufactured homes: 1) be equipped with an operable smoke detector in each room designed for sleeping, and 2) all fuel-gas-burning water heater appliances be seismically braced, anchored, or strapped pursuant to existing codes. A declaration may be signed within 45 days prior to the date of transfer of title stating that these requirements have been met.

I/We further agree to indemnify and save harmless the Director of the State of California, Department of Housing and Community Development, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the unit in California or from issuance of a California Certificate of Title covering the same. I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on _____

State _____

SECTION B - RELEASING SIGNATURES

1a. _____
Signature of Registered Owner

1b. _____ Date of Release _____

2. _____
Legal Owner of Record (if any) sign and check appropriate box
☐ Release ☐ Retain ☐ Assign Interest
(* If Assign Interest is checked, Complete New Legal Owner Below)

SECTION C - NEW OWNER INFORMATION

NEW REGISTERED OWNER - Please Print or Type Clearly

3a. _____ New Registered Owners Name
3c. _____ New Registered Owners Name

3b. _____ New Registered Owners Name
3d. _____ New Registered Owners Name

If more than one New Owner going onto title, please check the appropriate Co-owner term box.
☐ Joint Tenants with Right of Survivorship ☐ Tenants In Common OR ☐ Trust/Trustee(s)
☐ Tenants In Common AND ☐ Community Property ☐ Community Property with Right of Survivorship
(* If this box is checked-Complete HCD 476.6B)

4. _____ Mailing Address of New Registered Owner
City/State _____ Zip Code _____

5. _____ Actual Location Address of Unit
City/State _____ Zip Code _____

6. _____ Purchase Price or check box if Gift ☒ _____
Date of Transfer Date _____

7a. _____ Signature of New Registered Owners
7d. _____ Signature of New Registered Owners

7b. _____ Signature of New Registered Owners
7d. _____ Signature of New Registered Owners

NEW LEGAL OWNER - Please Print or Type Clearly

8a. BRIAN J. GALLIAN New Legal Owners Name
8b. Steven D. Gallian New Legal Owners Name

If more than one New Owner going onto title, please check the appropriate Co-owner term box below.
☒ Joint Tenants with Right of Survivorship ☐ Tenants In Common OR ☐ Trust/Trustee(s)
☐ Tenants In Common AND ☐ Community Property ☐ Community Property with Right of Survivorship
(* If this box is checked-Complete HCD 476.6B)

9. 16222 Monterey Ln #376 Mailing Address of New Legal Owner
City/State Huntington Beach, CA Zip Code 92649

NEW JUNIOR LIENHOLDER - Please Print or Type Clearly

10a. _____ New Junior Lienholder Name
10b. _____ New Junior Lienholder Name

11. _____ Mailing Address of New Junior Lienholder
City/State _____ Zip Code _____

SECTION D - RELEASE OF DEALERS

12. _____ Signature of Selling Dealer
Print Dealers Name and Dealer Number _____

OSP 09 112819

**STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
REGISTRATION CARD**

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name 90002 SKYLINE HOMES INC	Trade Name CUSTOM VILLA	Model -	DOM 05/29/2014	DFS 07/28/2014	RY	Exp. Date
Serial Number AC7V710394GB AC7V710394GA	Label/Insignia Number PFS1130281 PFS1130282	Weight 22,383 25,068	Length 56' 60'	Width 15' 2" 15' 2"	Issued Jan 19, 2019	

Addressee

J-SANDCASTLE CO LLC
16222 MONTEREY LANE ROOM 376
HUNTINGTON BEACH, CA 92649



Registered Owner(s)

J-SANDCASTLE CO LLC
16222 MONTEREY LANE ROOM 376
HUNTINGTON BEACH, CA 92649

Situs Address

16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

ATTENTION OWNER:

**THIS IS THE REGISTRATION CARD FOR THE
UNIT DESCRIBED ABOVE. PLEASE KEEP THIS
CARD IN A SAFE PLACE WITHIN THE UNIT.**

INSTRUCTIONS FOR RENEWAL:

**REGISTRATION FOR THIS UNIT EXPIRES ON THE
DATE INDICATED ABOVE IN THE BOX LABELED
"Exp. Date". THERE ARE SUBSTANTIAL
PENALTIES FOR DELINQUENCY. IF YOU DO NOT
RECEIVE A RENEWAL NOTICE WITHIN 10 DAYS
PRIOR TO THE EXPIRATION DATE, CONTACT
H.C.D. FOR RENEWAL INSTRUCTIONS.**

IMPORTANT

**THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.**

DTN: 10670236

01192019 - 1

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



STATEMENT OF FACTS

This unit is a: ☒ Manufactured Home / Mobilehome ☐ Commercial Modular ☐ Floating Home ☐ Truck Camper

Decal (License) No.(s):

LBM 1081

Trade Name:

Serial No.(s):

I/We, the undersigned, hereby state:

The original paperwork to add legal owner was lost in the mail. Customer sent photocopies of the application. Representative for J-Sandcastle CO LLC, Jamie Gallian states the legal owner is Joint Ronald J. Pierpont and JPod LLC at the same address: 16222 Monterey Ln # 376 Huntington Beach CA 92649

I/We further agree to indemnify and save harmless the Director of the Department of Housing and Community Development, State of California, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the above-described unit in California, or from issuance of a California Certificate of Title covering the same.

I/We certify under penalty of perjury that the foregoing is true and correct.

Executed on 02/22/2021 at Sacramento, CA
Date City State

Signature(s):

Rebecca O'Loughlin

Printed name(s):

Rebecca O'Loughlin, Program Tech III

Address _____

City _____ State _____

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



STATEMENT TO ENCUMBER

SECTION I. DESCRIPTION OF UNIT

This unit is a (check one):

☒ Manufactured Home, Mobilehome, Multifamily Manufactured Home ☐ Commercial Modular ☐ Truck Camper ☐ Floating Home

The Decal (License) Number(s) is: LBM1081

The Trade Name is: SKYLINE HOMES CUSTOM VILLA

The Serial Number(s) is: AC7V710394GB/GA

SECTION II. LEGAL OWNER INFORMATION

I/We are releasing legal owner interest in the above-described unit to encumber the title (record a lien) in favor of:

Ronald J. Pierpont, Member J Pad LLC
(Name of New Legal Owner)

Address: 16222 MONTEREY LN. #376 HUNTINGTON BEACH, CA 92649
Street Address or P.O. Box City State Zip

SECTION III. CERTIFICATION

I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 8/20/2020 at HUNTINGTON BEACH, CALIFORNIA
Date City State

Signature of each registered owner:

Jamie L. Gallian

Printed name of each registered owner:

J-SANDCASTLE CO LLC JAMIE L. GALLIAN, MEMBER

Address: 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649
Street Address or P. O. Box City State Zip

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



STATEMENT OF FACTS

This unit is a: ☒ Manufactured Home / Mobilehome ☐ Commercial Modular ☐ Floating Home ☐ Truck Camper

Decal (License) No.(s): LBM1D81	Trade Name: Custom Villa	Serial No.(s): AC7V710394GB AC7V710394GA
------------------------------------	-----------------------------	--

I/We, the undersigned, hereby state:

J-Sandcastle wishes to disregard former Statement to Encumber / Lien Assignment for favor of NEW legal owner J-Pad LLC Ronald S. Pierpont. The New legal owner is J-Pad LLC, Ronald S Pierpont, Member.

I/We further agree to indemnify and save harmless the Director of the Department of Housing and Community Development, State of California, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the above-described unit in California, or from issuance of a California Certificate of Title covering the same.

I/We certify under penalty of perjury that the foregoing is true and correct.

Executed on 8/20/2020 at Huntington Beach, CA
Date City State

Signature(s):

J-Sandcastle CO LLC
By Janice Gillman
JANICE GILLMAN

Printed name(s):

J-Sandcastle CO LLC

Address 16222 Monterey Ln #376
City Huntington Beach State CA

HCD RT 476.6 (Rev. 07/16)

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



STATEMENT OF FACTS

This unit is a: ☒ Manufactured Home / Mobilehome ☐ Commercial Modular ☐ Floating Home ☐ Truck Camper

Decal (License) No.(s):	Trade Name:	Serial No.(s):
LBM 1081	SKYLINE HOMES	AC7V710394GB/GA

I/We, the undersigned, hereby state: *J-Sandcastle Co LLC made errors on the Certificate of Title. The only change to the Certificate of Title is the addition of two names as legal owners as indicated on the Statement to Encumber dated 8/20/2020. The legal owners to be added to the Certificate of Title are STEVEN D. GALLIAN and BRIAN J. GALLIAN*

I/We further agree to indemnify and save harmless the Director of the Department of Housing and Community Development, State of California, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the above-described unit in California, or from issuance of a California Certificate of Title covering the same.

I/We certify under penalty of perjury that the foregoing is true and correct.

Executed on 08/20/2020 at HUNTINGTON BEACH CA
Date City State

Signature(s): <i>Jamie Gallian</i>	Printed name(s): J-SANDCASTLE CO LLC JAMIE GALLIAN MEMBER
---------------------------------------	--

Address 16222 MONTEREY LN. #376
City HUNTINGTON BEACH State CA

HCD, RT 476.6 (Rev. 07/16)

Copy

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



STATEMENT TO ENCUMBER

SECTION I. DESCRIPTION OF UNIT

This unit is a (check one):

☒ Manufactured Home, Mobilehome, Multifamily Manufactured Home ☐ Commercial Modular ☐ Truck Camper ☐ Floating Home

The Decal (License) Number(s) is: LBM1081

The Trade Name is: SKYLINE HOMES CUSTOM VILLA

The Serial Number(s) is: AC7V710394GB/GA

SECTION II. LEGAL OWNER INFORMATION

I/We are releasing legal owner interest in the above-described unit to encumber the title (record a lien) in favor of:

STEVEN D GALLIAN AND BRIAN J. GALLIAN JOINT TENANTS Right of Survivorship

(Name of New Legal Owner)

Address: 16222 MONTEREY LN. #376 HUNTINGTON BEACH, CA 92649

Street Address or P.O. Box

City

State

Zip

SECTION III. CERTIFICATION

I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 8/20/2020

Date

at

HUNTINGTON BEACH, CALIFORNIA

City

State

Signature of each registered owner:

Printed name of each registered owner:

Jamie L. Gallian, Member

J-SANDCASTLE CO LLC JAMIE L. GALLIAN, MEMBER

Address: 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649

Street Address or P. O. Box

City

State

Zip

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



LIEN ASSIGNMENT

SECTION I. DESCRIPTION OF UNIT

This unit is a (check one):

☒ Manufactured Home, Mobilehome, Multifamily Manufactured Home ☐ Commercial Modular ☐ Truck Camper ☐ Floating Home

The Decal (License) Number(s) is: LBM 1081

The Trade Name is: SKYLINE HOMES CUSTOM VILLA

The Serial Number(s) is: ACTV710394GB/GA

SECTION II. NAME AND ADDRESS OF PARTY ASSIGNING LIEN (ASSIGNOR)

Name of Assignor: J-SANDCASTLE CO LLC, JAMIE L. GALLIAN, MEMBER

Mailing Address of Assignor: 16222 Monterey Ln. #376 Huntington Beach CA 92649

Street Address or P.O. Box

City

State

Zip

SECTION III. DEBTOR(S) NAME AND ADDRESS

Name of Debtor(s): J-SANDCASTLE CO LLC, JAMIE L. GALLIAN, MEMBER

Mailing Address of Debtor(s): 16222 MONTEREY LN #376 HUNTINGTON BEACH, CA 92649

Street Address or P.O. Box

City

State

Zip

Location Address: 16222 MONTEREY LN. #376 HUNTINGTON BEACH, CA 92649

Street Address

City

County

State

SECTION IV. NAME AND ADDRESS OF PARTY TO WHICH LIEN HAS BEEN ASSIGNED (ASSIGNEE)

Name of Assignee: STEVEN D. GALLIAN AND BRIAN J. GALLIAN, JOINT TENANTS Right of Survivorship

Mailing Address of Assignee: 16222 MONTEREY LN. #376 HUNTINGTON BEACH, CA 92649

Street Address or P.O. Box

City

State

Zip

SECTION V. ASSIGNOR'S CERTIFICATION

I/We the assignor certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct that my/our lien in the name of the debtor(s), for the described unit, has been transferred to the assignee on 8/20/2020

Date of Lien Assignment

Executed on 8/20/2020 at HUNTINGTON BEACH, CA

Date

City

State

Signature of Authorized Agent: 

ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of ORANGE

On AUG, 28, 2020 before me, ALEX MAJDPOUR NOTARY PUBLIC
(insert name and title of the officer)

personally appeared JAMIE LYNN GALLIAN
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature



(Seal)

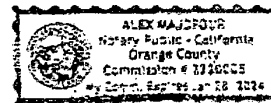


EXHIBIT 21



DTN: 12313525

Decal: LBM1081

Unit ID: 252606085

Trans Type: R/O Transfer - No Sale

Trans Date: 07/14/2021

Trade Name: CUSTOM VILLA

Serial #: AC7V710394GA, AC7V710394GB

Insignia # PFS1130281, PFS1130282

Status Date: 08/02/2021 User Name: SHAH, KIRAN

STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
CERTIFICATE OF TITLE

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name 90002 SKYLINE HOMES INC	Trade Name CUSTOM VILLA	Model		DOM 05/29/2014	DFS 07/28/2014	RY
Serial Number AC7V710394GB AC7V710394GA	Label/Insignia Number PFS1130281 PFS1130282	Weight 22,383 25,068	Length 56' 60'	Width 15' 2" 15' 2"	Issued Feb 24, 2021	

Addressee

RONALD J PIERPONT
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

JUL 14 2021

Registered Owner(s)

J-SANDCASTLE CO LLC
16222 MONTEREY LANE ROOM 376
HUNTINGTON BEACH, CA 92649

Situs Address

16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

Legal Owner(s)

RONALD J PIERPONT
JPAD LLC
Tenants in Common Or
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649
Lien Perfected On: 08/20/20 11:58:00

12313525

IMPORTANT

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

DTN: 12153896

02242021 - 2

SECTION A - SMOKE DETECTOR AND WATER HEATER SEISMIC BRACING CERTIFICATION

California Health and Safety Code (HSC) Sections 18029.6 and 18031.7 require that on the date of transfer of title all used manufactured homes, used mobilehomes, and used multifamily manufactured homes: 1) be equipped with an operable smoke detector in each room designed for sleeping, and 2) all fuel-gas-burning water heater appliances be seismically braced, anchored, or strapped pursuant to existing codes. A declaration may be signed within 45 days prior to the date of transfer of title stating that these requirements have been met.

I/We further agree to indemnify and save harmless the Director of the State of California, Department of Housing and Community Development, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the unit in California or from issuance of a California Certificate of Title covering the same. I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 2/25/2021 at Huntington Beach CALIFORNIA
J. SANDCASTLE COLLE
Signature Printed Name

SECTION B - RELEASING SIGNATURES

1a. J. SANDCASTLE COLLE J. Sandcastle Date of Release 2/25/2021
Releasing Signature of Registered Owner

1b. _____ Date of Release _____
Releasing Signature of Registered Owner

2. _____ ☒ Release ☐ Retain ☐ Assign Interest
Legal Owner of Record (if any) sign and check appropriate box (* If Assign Interest is checked - Complete New Legal Owner Below)

SECTION C - NEW OWNER INFORMATION

NEW REGISTERED OWNER - Please Print or Type Clearly

3a. JAMIC LYNN GALLIAN 3c. J. SANDCASTLE COLLE
New Registered Owners Name New Registered Owners Name
3b. J. SANDCASTLE COLLE 3d. _____
New Registered Owners Name New Registered Owners Name

If more than one New Owner going onto title, please check the appropriate Co-owner term box.
☐ Joint Tenants with Right of Survivorship ☐ Tenants In Common OR ☐ Trust/Trustee(s)
(* If this box is checked-Complete HCD 476.6B)
☒ Tenants In Common AND ☐ Community Property ☐ Community Property with Right of Survivorship

4. 16222 Monterey Ln #376 Huntington Beach, CA 92649
Mailing Address of New Registered Owner City/State Zip Code
5. 16222 Monterey Ln #376 Huntington Beach, CA 92649
Actual Location Address of Unit City/State Zip Code

6. 0 2/25/2021
Purchase Price or check box if Gift ☒ Purchase Date or Transfer Date
7a. Jamic Lynn Gallian 7c. J. SANDCASTLE COLLE
Signature of New Registered Owners Signature of New Registered Owners
7b. J. SANDCASTLE COLLE 7d. J. SANDCASTLE COLLE
Signature of New Registered Owners Signature of New Registered Owners

NEW LEGAL OWNER - Please Print or Type Clearly

8a. J. SANDCASTLE COLLE 8b. _____
New Legal Owners Name New Legal Owners Name

If more than one New Lender going onto title, please check the appropriate Co-owner term box below.
☐ Joint Tenants with Right of Survivorship ☐ Tenants In Common OR ☐ Trust/Trustee(s)
(* If this box is checked-Complete HCD 476.6B)
☐ Tenants In Common AND ☐ Community Property ☐ Community Property with Right of Survivorship

9. 16222 Monterey Ln #376 Huntington Beach, CA 92649
Mailing Address of New Legal Owner City/State Zip Code

NEW JUNIOR LIENHOLDER - Please Print or Type Clearly

10a. _____ 10b. _____
New Junior Lienholder Name New Junior Lienholder Name

11. _____
Mailing Address of New Junior Lienholder City/State Zip Code

SECTION D - RELEASE OF DEALERS

12. _____
Signature of Selling Dealer Print Dealers Name and Dealer Number

ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of ORANGE

On 2/25/21 before me, Greg Buysman, Notary Public
(insert name and title of the officer)

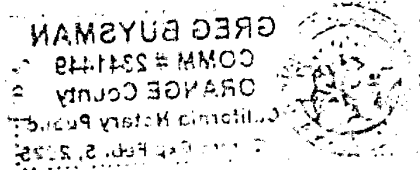
personally appeared Denise Lynn Gellman
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature [Signature] (Seal)



**STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
REGISTRATION CARD**

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name	Trade Name	Model	DOM	DFS	RY	Exp. Date
90002 SKYLINE HOMES INC	CUSTOM VILLA		05/29/2014	07/28/2014		
Serial Number	Label/Insignia Number	Weight	Length	Width	Issued	
AC7V710394GB	PFS1130281	22,383	56'	15' 2"	Feb 24, 2021	
AC7V710394GA	PFS1130282	25,068	60'	15' 2"		

Addressee

RONALD J PIERPONT
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649



Registered Owner(s)

J-SANDCASTLE CO LLC
16222 MONTEREY LANE ROOM 376
HUNTINGTON BEACH, CA 92649

Situs Address

16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

Legal Owner(s)

RONALD J PIERPONT
JPAD LLC
Tenants in Common Or
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649
Lien Perfected On: 08/20/20 11:58:00

**LEGAL OWNER COPY
INFORMATION ONLY**

IMPORTANT

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

DTN: 12153896

02242021 - 1

STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
REGISTRATION CARD

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name 90002 SKYLINE HOMES INC	Trade Name CUSTOM VILLA	Model	DOM 05/29/2014	DFS 07/28/2014	RY	Exp. Date
Serial Number AC7V710394GB AC7V710394GA	Label/Insignia Number PFS1130281 PFS1130282	Weight 22,383 25,068	Length 56' 60'	Width 15' 2" 15' 2"	Issued Feb 24, 2021	

Addressee

J-SANDCASTLE CO LLC
16222 MONTEREY LANE ROOM 376
HUNTINGTON BEACH, CA 92649



Registered Owner(s)

J-SANDCASTLE CO LLC
16222 MONTEREY LANE ROOM 376
HUNTINGTON BEACH, CA 92649

Situs Address

16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

Legal Owner(s)

RONALD J PIERPONT
JPAD LLC
Tenants in Common Or
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649
Lien Perfected On: 08/20/20 11:58:00

ATTENTION OWNER:

THIS IS THE REGISTRATION CARD FOR THE
UNIT DESCRIBED ABOVE. PLEASE KEEP THIS
CARD IN A SAFE PLACE WITHIN THE UNIT.

INSTRUCTIONS FOR RENEWAL:

REGISTRATION FOR THIS UNIT EXPIRES ON THE
DATE INDICATED ABOVE IN THE BOX LABELED
"Exp. Date". THERE ARE SUBSTANTIAL
PENALTIES FOR DELINQUENCY. IF YOU DO NOT
RECEIVE A RENEWAL NOTICE WITHIN 10 DAYS
PRIOR TO THE EXPIRATION DATE, CONTACT
H.C.D. FOR RENEWAL INSTRUCTIONS.

IMPORTANT

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

DTN: 12153896

02242021 - 1

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



LIEN SATISFIED

SECTION I. DESCRIPTION OF UNIT

This unit is a:

☒ Manufactured Home/Mobilehome ☐ Commercial Modular ☐ Floating Home ☐ Truck Camper

The Decal (License) No.(s) of the unit is: LBM1081

The Trade Name of the unit is: CUSTOM VILLA

The Serial No.(s) of the unit is: AC7V710394GB/AC7V710394GA

SECTION II. DEBTOR(S) NAME(S)

Name of Debtor(s): J-SANDCASTLE CO, LLC

SECTION III. LIENHOLDER'S CERTIFICATION

This is to certify that our/my lien in the name(s) of the debtor(s) shown above against the described unit has been fully satisfied and has not been assigned to any other party.

I/We certify under penalty of perjury that the foregoing is true and correct.

Print or Type Name of Legal Owner or Jr. Lienholder (Lender):

J-PAD LLC or RONALD J. PIERPONT

Signature of Legal Owner, Jr. Lienholder (Lender) or their Authorized Agent:

Ronald J Pierpont Date 7/9/2021

Address 16222 MONTEREY LN. #376 HUNTINGTON BEACH, CA 92649
Street Address or P.O. Box City State Zip

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



STATEMENT OF FACTS

This unit is a: ☒ Manufactured Home / Mobilehome ☐ Commercial Modular ☐ Floating Home ☐ Truck Camper

Decal (License) No.(s):
LBM 1081

Trade Name:
Skyline Custom Villa

Serial No.(s):
AC7V710394GB/GA

I/We, the undersigned, hereby state:

Jamie Lynn Gallian is the sole registered owner of 2014 home. J-Pad LLC or Robert McLelland is the Legal Owner.

I/We further agree to indemnify and save harmless the Director of the Department of Housing and Community Development, State of California, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the above-described unit in California, or from issuance of a California Certificate of Title covering the same.

I/We certify under penalty of perjury that the foregoing is true and correct.

25th of Feb. 2021 Huntington Beach, CA 92649
Executed on _____ at _____, _____
Date City State

Signature(s):

A handwritten signature in black ink, appearing to read "Jamie Lynn Gallian".

Printed name(s):
Jamie Lynn Gallian

21742 Anza Avenue

Address _____

Torrance

City _____

CA 90503

State _____

ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Orange

On 2/25/21 before me, Greg Buysman, Notary Public
(insert name and title of the officer)

personally appeared Denise Lynn Collins
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature Greg Buysman (Seal)



STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



STATEMENT OF FACTS

This unit is a: ☒ Manufactured Home / Mobilehome ☐ Commercial Modular ☐ Floating Home ☐ Truck Camper

Decal (License) No.(s): LBM1081	Trade Name:	Serial No.(s):
--	-------------	----------------

I/We, the undersigned, hereby state:

I spoke with Jamie Gallian and she states the unit should be registered as Jamie Gallian as sole registered owner. The lien has been satisfied and there is no legal owner at this time. Jamie advised the county and was told there was no need to revise the Tax Clearance certificate.

I/We further agree to indemnify and save harmless the Director of the Department of Housing and Community Development, State of California, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the above-described unit in California, or from issuance of a California Certificate of Title covering the same.

I/We certify under penalty of perjury that the foregoing is true and correct.

Executed on 7/28/21 at Sacramento, CA
Date City State

Signature(s): <u>Debra M. O'Loughlin</u>	Printed name(s): <u>Debra M O'Loughlin, Program Tech II</u>
---	--

Address _____

City _____ State _____

State of California
Department of Housing and Community Development
Division of Codes and Standards
Registration and Titling Program
P.O. Box 277820, Sacramento, CA 95827-7820
(800) 952-8356
www.hcd.ca.gov



MULTI-PURPOSE TRANSFER FORM

PLEASE COMPLETE ONLY THE SECTIONS THAT APPLY AND SIGN BOTTOM OF FORM

UNIT DESCRIPTION

Decal (License) No.(s): LBM1081 Serial No.(s): AC7V710394GA; AV7V710394GA

SMOKE DETECTOR AND CARBON MONOXIDE CERTIFICATION

I/We, the undersigned, hereby state that the manufactured home, mobilehome, or multifamily manufactured home described above is equipped with a properly working, operable smoke detector in accordance with California Health and Safety Code Section 18029.6 and a carbon monoxide detector in accordance to California Residential Code Section R315.

☒ YES ☐ NO

PARK PURCHASE FEE EXEMPTION

The registered owner of the above-described manufactured home/mobilehome that is located on private property owned by the registered owner is exempt from payment of the \$5 Park Purchase Fund (PPF) fee (Health and Safety Code Section 18114.1). If you feel you qualify for the exemption, complete the following questions:

- Do you (the registered owner) own your manufactured home/mobilehome? ☒ YES ☐ NO
- Do you (the registered owner) own the land your manufactured home/mobilehome is located on? ☐ YES ☒ NO


DESIGNATION OF CO-OWNER TERM

We request the Department of Housing and Community Development to register our ownership interest in the unit described above with the following co-owner term: **(READ CAREFULLY AND CHECK ONE BOX.)**

- ☐ **JTRS (Joint Tenants with Right of Survivorship):** Upon the death of a joint tenant, the interest of the deceased party passes to the surviving joint tenant. The signature of each joint tenant is required to transfer or encumber the title.
- ☒ **TENCOM AND (Tenants in Common with the names joined by the word AND):** Each tenant in common may transfer his or her individual interest without the signature of the other tenant(s) in common. The signature of each tenant in common is required to transfer full interest in the unit to a new registered owner or to encumber the title.
- ☐ **TENCOM OR (Tenants in Common with the names joined by the word OR):** Any one of the tenants in common may transfer full ownership interest in the unit to a new registered owner without the signature of the other tenant(s) in common. The signature of each tenant in common is required to encumber the title.
- ☐ **COMPRO (Community Property):** A unit may be registered as community property in the names of a husband and wife. The signature of each spouse is required to transfer full interest in the unit or encumber the title.
- ☐ **COMPRORS (Community Property with Right of Survivorship):** A unit may be registered as community property in the names of a husband and wife. At the death of one spouse, the decedent's community property interest passes to the surviving spouse without administration. The signature of each spouse is required to transfer full interest in the unit or encumber the title.

I/We further agree to indemnify and save harmless the Director of the State of California, Department of Housing and Community Development, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the above described unit in California, or from, issuance of a California Certificate of Title covering the same.

I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 02/25/2021 at HUNTINGTON BEACH, CALIFORNIA COUNTY OF ORANGE
 Date 02/25/2021 City J-Sandcastle Co LLC State CA
Signature _____ Signature _____
Signature _____ Signature _____
PHONE #: (714) 321-3449 E-MAIL ADDRESS: jamiegalian@gmail.com

HCD RT 476.6G Side 1 (Rev. 08/20)

Decal (License) No.(s): LBM1081

Serial No.(s): AC7V710394GA; AC7V710394GA

DECLARATION OF INSTALLATION OF WATER HEATER SEISMIC BRACING

I/We the undersigned hereby state that all fuel gas-burning water heater appliances in the manufactured home, mobilehome, or multifamily manufactured housing described above are seismically braced, anchored, or strapped in accordance with Health and Safety Code Section 18031.7 and Part 5 of Title 24 of the California Code of Regulations.

☒ YES ☐ NO ☐ Electric water heater is installed per manufacturer's instructions.

SIGNATURE ON FRONT SIDE IS CERTIFICATION FOR THIS SECTION

REASON FOR USE TAX AND/OR MOBILEHOME RECOVERY FUND FEE EXEMPTION

Check appropriate box(es):

☒ The above-described unit was a gift. All rights and interest of ownership were transferred without exchange or money or other valuable consideration.

☒ The above-described unit has been acquired from: J-SANDCASTLE CO LLC, JAMIE LYNN GALLIAN, ITS MEMBER
parents, spouse, grandparent(s), grandchild, child, brother(s), sister(s)**

☒ The name of a CO-OWNER is being ☒ ADDED ☐ DELETED to the record.
show relationship

☐ The above-described unit was received as the result of an inheritance.

☐ Transfer of the above-described unit is being made pursuant to a court order.

☐ The transfer of the unit is being made to a revocable trust which (1) the seller has an unrestricted power to revoke the trust, (2) the transfer does not result in any change in the beneficial ownership of the property, (3) the trust provides that upon revocation of the trust the property will revert wholly to the seller, and (4) the only consideration for the transfer is the assumption by the trust of an existing loan for which the tangible personal property being transferred is the sole collateral for the assumed loan.

*NOTE: A sale between brother(s) or sister(s) is subject to use tax unless both are minors. If minors, check here: ☐

SIGNATURE ON FRONT SIDE IS CERTIFICATION FOR THIS SECTION

DESIGNATION OF TRUST

I/We, the undersigned trustee(s), hereby state that the unit described above has been placed into a trust. This Declaration of Trust is dated _____.

In compliance with Section 18080.1(b) of the California Health and Safety Code, I/we as trustee(s) hereby request the unit described above be registered as shown below. I/We acknowledge that the Department's permanent title record and the titling documents for the unit will reflect the information as shown below.

Print Name of the Trust. This is how the name of the Trust will appear on title.

I/We as trustee(s) agree(s) to notify and make application with the Department of Housing and Community Development to appropriately amend the permanent registration and titling record immediately upon any change to the original trust agreement described herein by submitting this form along with all appropriate documents, fees or any other needed items to the Department.

I/We as trustee(s) further agree(s) to indemnify and save harmless the Director of the Department of Housing and Community Development, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the above described unit in California and from issuance of a California Certificate of Title covering the same.

I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on _____ at _____
Date City State

Trustee Signature(s): _____

Street Address or P.O. Box _____
City State



TAX CLEARANCE CERTIFICATE

☒ Mobile Home

☐ Floating Home

COUNTY OF ORANGE

SERIAL NUMBER/HULL NUMBER AC7V710394GA, AC7V710394GB	DECAL NUMBER/CF NUMBER LBM1081
LOCATION OF HOME 16222 MONTEREY LN 376 HUNTINGTON BEACH	ASSESSOR'S PARCEL NUMBER 891-569-62
CURRENT REGISTERED OWNER J-SANDCASTLE CO LLC 16222 MONTEREY LN SPC 376 HUNTINGTON BEACH CA 92649	APPLICANT J-SANDCASTLE CO LLC & JAMIE L. GALLIAN 16222 MONTEREY LN #376 HUNTINGTON BEACH CA 92649

I hereby certify that the following has been paid:

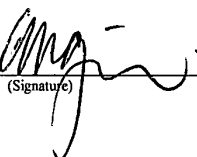
- ☐ Delinquent license fees
- ☐ Property taxes applicable to the home identified above through the fiscal year
- ☒ A security deposit for payment of the property taxes for the fiscal year 2021-2022
- ☒ No taxes due or payable at this time.

There may be a supplemental assessment not covered by this "Tax Clearance Certificate" which may create an additional bill.

THIS CERTIFICATE IS VOID ON AND AFTER SEPTEMBER 7, 2021.

Executed on July 9, 2021 at Santa Ana.
Treasurer-Tax Collector for Orange County, State of California.

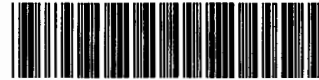
Issued on July 9, 2021


(Signature)

§2189.8, 5832 R & T Code

TDL 10-01 (7-87)

EXHIBIT 22



DTN: 12339739

Decal: LBM1081

Unit ID: 252606085

Trans Type: L/O Addition

Trans Date: 08/10/2021

Trade Name: CUSTOM VILLA

Serial #: AC7V710394GA, AC7V710394GB

Insignia # PFS1130281, PFS1130282

Status Date: 08/11/2021 User Name: CRUZ, SYLVIA

STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
CERTIFICATE OF TITLE

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name 90002 SKYLINE HOMES INC	Trade Name CUSTOM VILLA	Model		DOM 05/29/2014	DFS 07/28/2014	RY
Serial Number AC7V710394GB AC7V710394GA	Label/Insignia Number PFS1130281 PFS1130282	Weight 22,383 25,068	Length 56' 60'	Width 15' 2" 15' 2"	Issued Aug 03, 2021	

Addressee

JAMIE LYNN GALLIAN
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

Registered Owner(s)

JAMIE LYNN GALLIAN
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

Situs Address

16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

IMPORTANT

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

DTN: 12313525

08032021 - 2

AUG 10 2021

12339139

SECTION A - SMOKE DETECTOR AND WATER HEATER SEISMIC BRACING CERTIFICATION

California Health and Safety Code (HSC) Sections 18029.6 and 18031.7 require that on the date of transfer of title all used manufactured homes, used mobilehomes, and used multifamily manufactured homes: 1) be equipped with an operable smoke detector in each room designed for sleeping, and 2) all fuel-gas-burning water heater appliances be seismically braced, anchored, or strapped pursuant to existing codes. A declaration may be signed within 45 days prior to the date of transfer of title stating that these requirements have been met.

I/We further agree to indemnify and save harmless the Director of the State of California, Department of Housing and Community Development, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the unit in California or from issuance of a California Certificate of Title covering the same. I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on _____ at _____ City _____ State _____

Signature

Printed Name

SECTION B - RELEASING SIGNATURES

1a. _____ Date of Release _____
Releasing Signature of Registered Owner

1b. _____ Date of Release _____
Releasing Signature of Registered Owner

2. _____ ☐ Release ☐ Retain * ☐ Assign Interest

Legal Owner of Record (if any) sign and check appropriate box

(* If Assign Interest is checked - Complete New Legal Owner Below)

SECTION C - NEW OWNER INFORMATION

NEW REGISTERED OWNER - Please Print or Type Clearly

3a. _____ 3c. _____
New Registered Owners Name New Registered Owners Name

3b. _____ 3d. _____
New Registered Owners Name New Registered Owners Name

If more than one New Owner going onto title, please check the appropriate Co-owner term box.

☐ Joint Tenants with Right of Survivorship ☐ Tenants In Common OR ☐ Trust/Trustee(s)
☐ Tenants In Common AND ☐ Community Property ☐ Community Property with Right of Survivorship
(* If this box is checked-Complete HCD 476.6B)

4. _____ 5. _____ 6. _____
Mailing Address of New Registered Owner City/State Zip Code

5. _____ 6. _____ 7. _____
Actual Location Address of Unit City/State Zip Code

6. _____ 7. _____ 8. _____
Purchase Price or check box if Gift-☐ Purchase Date or Transfer Date

7a. _____ 7c. _____
Signature of New Registered Owners Signature of New Registered Owners

7b. _____ 7d. _____
Signature of New Registered Owners Signature of New Registered Owners

NEW LEGAL OWNER - Please Print or Type Clearly

8a. _____ 8b. _____
New Legal Owners Name New Legal Owners Name

If more than one New Lender going onto title, please check the appropriate Co-owner term box below.

☐ Joint Tenants with Right of Survivorship ☐ Tenants In Common OR ☐ Trust/Trustee(s)
☐ Tenants In Common AND ☐ Community Property ☐ Community Property with Right of Survivorship
(* If this box is checked-Complete HCD 476.6B)

9. _____ 10. _____ 11. _____
Mailing Address of New Legal Owner City/State Zip Code

NEW JUNIOR LIENHOLDER - Please Print or Type Clearly

10a. _____ 10b. _____
New Junior Lienholder Name New Junior Lienholder Name

11. _____ 12. _____
Mailing Address of New Junior Lienholder City/State Zip Code

SECTION D - RELEASE OF DEALERS

12. _____
Signature of Selling Dealer Print Dealers Name and Dealer Number

STATE OF CALIFORNIA - DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
REGISTRATION CARD

Manufactured Home

Decal: LBM1081

Manufacturer ID/Name 90002 SKYLINE HOMES INC	Trade Name CUSTOM VILLA	Model	DOM 05/29/2014	DFS 07/28/2014	RY	Exp. Date
Serial Number AC7V710394GB AC7V710394GA	Label/Insignia Number PFS1130281 PFS1130282	Weight 22,383 25,068	Length 56' 60'	Width 15' 2" 15' 2"	Issued Aug 03, 2021	

Addressee

JAMIE LYNN GALLIAN
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649



Registered Owner(s)

JAMIE LYNN GALLIAN
16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

Situs Address

16222 MONTEREY LN SPACE 376
HUNTINGTON BEACH, CA 92649

ATTENTION OWNER:

THIS IS THE REGISTRATION CARD FOR THE
UNIT DESCRIBED ABOVE. PLEASE KEEP THIS
CARD IN A SAFE PLACE WITHIN THE UNIT.

INSTRUCTIONS FOR RENEWAL:

REGISTRATION FOR THIS UNIT EXPIRES ON THE
DATE INDICATED ABOVE IN THE BOX LABELED
"Exp. Date". THERE ARE SUBSTANTIAL
PENALTIES FOR DELINQUENCY. IF YOU DO NOT
RECEIVE A RENEWAL NOTICE WITHIN 10 DAYS
PRIOR TO THE EXPIRATION DATE, CONTACT
H.C.D. FOR RENEWAL INSTRUCTIONS.

IMPORTANT

THE OWNER INFORMATION SHOWN ABOVE MAY NOT REFLECT ALL LIENS RECORDED WITH THE
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT AGAINST THE DESCRIBED UNIT. THE
CURRENT TITLE STATUS OF THE UNIT MAY BE CONFIRMED THROUGH THE DEPARTMENT.

DTN: 12313525

08032021 - 1

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



STATEMENT OF FACTS

This unit is a: ☒ Manufactured Home / Mobilehome ☐ Commercial Modular ☐ Floating Home ☐ Truck Camper

Decal (License) No.(s):	Trade Name:	Serial No.(s):
LBM1081	CUSTOM VILLA	AC7V710394GB/GA

I/We, the undersigned, hereby state:

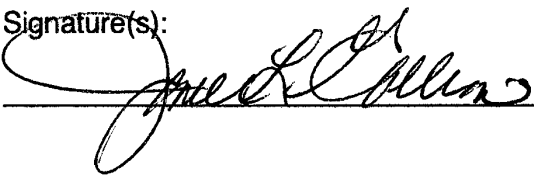
Jamie L. Gallian, say that J-Pad, LLC is the Legal Owner and perfected their lien 1/14/2019. ★

The correct Address for the Legal Owner - J-Pad LLC
21742 Anza Ave, Torrance, CA 90503

I/We further agree to indemnify and save harmless the Director of the Department of Housing and Community Development, State of California, and subsequent purchasers of said unit, for any loss they may suffer resulting from registration of the above-described unit in California, or from issuance of a California Certificate of Title covering the same.

I/We certify under penalty of perjury that the foregoing is true and correct.

Executed on 8/6/2021 at Huntington Beach, CA
Date City State

Signature(s): 	Printed name(s): Jamie Lynn Gallian
--	--

Address 16222 Monterey Ln #376
City Huntington Beach State CA 92649

STATE OF CALIFORNIA
BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF CODES AND STANDARDS
REGISTRATION AND TITLING PROGRAM



STATEMENT TO ENCUMBER

SECTION I. DESCRIPTION OF UNIT

This unit is a (check one):

☒ Manufactured Home, Mobilehome, Multifamily Manufactured Home ☐ Commercial Modular ☐ Truck Camper ☐ Floating Home

The Decal (License) Number(s) is: LBM1081

The Trade Name is: SKYLINE HOMES-CUSTOM VILLA

The Serial Number(s) is: AC7V710394GB; AC7V710394GA

SECTION II. LEGAL OWNER INFORMATION

I/We are releasing legal owner interest in the above-described unit to encumber the title (record a lien) in favor of:

J-PAD, LLC - SOS ENTITY NO. 201804010750

(Name of New Legal Owner)

Address: 2702 N. GAFF STREET ORANGE, CA 92865
Street Address or P. O. Box City State Zip

SECTION III. CERTIFICATION

I/We certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on 1/14/2019 at HUNTINGTON BEACH, CALIFORNIA, CO. OF ORANGE
Date City State

Signature of each registered owner:

Jane L. Llanes, its Member

Printed name of each registered owner:

J-SANDCASTLE CO LLC

Address: 16222 MONTEREY LN 376 HUNTINGTON BEACH, CA 92649
Street Address or P. O. Box City State Zip

HCD 484.7 (Rev. 11/14)

EXHIBIT 23



Return of Payment

February 2, 2021

TO:

Gallian, Jamie and J-Sandcastle Co. LLC
16222 Monterey Ln. SPC 376
Huntington Beach, CA 92649

Dear Jamie Gallian and J-Sandcastle Co. LLC,

At this time we are unable to accept your payment of \$1086.00 dated February 1, 2021 check # 4508 due to the current legal proceedings and being that you are not a registered resident of Space #376. You will find the check enclosed.

Sincerely,

Molly Curtiss
Rancho Del Rey Mobile Home Estates

90-7162/3222 4508

J-SANDCASTLE CO, LLC
JAMIE GALLIAN

DATE 2/1/2021

PAY TO THE ORDER OF One thousand eight hundred \$ 108.00

CHASE
JPMorgan Chase Bank, N.A.
www.Chase.com

MEMO SP #376

[Signature]

Security Features
Look for these features on Chase's Bank

4508

90-7162/3222 4589

J-SANDCASTLE CO, LLC
JAMIE GALLIAN

DATE 3/2/2021

PAY TO THE ORDER OF RSR MHE

\$ 1286.00

DOLLARS

CHASE

JPMorgan Chase Bank, N.A.
www.Chase.com

MEMO SP 326

Security Features
Details on Back

4589



Return of Payment

April 12, 2021

TO:

Gallian, Jamie and J-Sandcastle Co. LLC
16222 Monterey Ln. SPC 376
Huntington Beach, CA 92649

Dear Jamie Gallian and J-Sandcastle Co. LLC,

At this time we are unable to accept your payment of \$1086.00 dated April 9, 2021 check # 4590 due to the current legal proceedings and being that you are not a registered resident of Space #376. You will find the check enclosed.

Sincerely,

Molly Curtiss

Rancho Del Rey Mobile Home Estates



Kent Payment.

Please Credit to the Account

J-Sandcastle Co LLC SPACE

16222 Monterey Ln # 376

Huntington Beach, CA 92649

Cash Payment \$1100.00

Placed in Office at RDR 5/13/2021 12:11 PM.

J. Salton, Manager.

On Thursday May 13th 2021, we received an envelope in the box during our lunch closure. The envelope contained \$1100 and a note from Jamie Gallian. All three of us counted the money. It is being returned to her attorney.

x  5/13/21
Molly Curtiss

x  5/13/21
Rick Maskulinski

x  5/13/21
Chris Houser



ELAINE B. ALSTON
VIVIANNE J. ALSTON
DONALD A. DIEBOLD

ALSTON, ALSTON & DIEBOLD
ATTORNEYS AT LAW

TELEPHONE (714) 556-9400
FACSIMILE (714) 556-9500

27201 PUERTA REAL
SUITE 300
MISSION VIEJO, CALIFORNIA 92691

1510

May 14, 2021

Hand Delivered

Mr. James Casello
Casello and Lincoln
525 Cabrillo Park Dr., Ste 104
Santa Ana, California 92701

Re: Houser Bros Co. v Gallian
Ca. Court Case Number 30-2019-01041423 CL UD CJC

Dear Mr. Casello:

Please find attached to this hand delivered letter the return of the cash payment of \$1,100.00 which Ms. Gallian dropped through the mail slot at the Park Office yesterday afternoon.

As you and Ms. Gallian are aware Rancho Del Rey Mobile Home Estates will not accept any monies from Ms. Gallian as payment of rent due to the pending litigation.

This money is being returned to your office as a one-time courtesy due to security concerns. As Ms. Gallian does not usually answer her door to speak with Park Management, Park Management did not want to leave an envelope containing a large sum of cash taped to her door. However, if Ms. Gallian makes any future attempt to pay with cash, the Park Management will return it to her at her space and if she does not answer the door the monies will be taped to the mobilehome, despite the security risks. I sincerely hope that will not be necessary.

Further, Ms. Gallian contacted my office earlier this week stating her electricity was about to be cut off. As I stated in my e-mail to you, the Park is not involved in any disruption of her services. Both I, and Park Management, are willing to assist you in avoiding a disruption of her services. Please let me know if you need any assistance in this issue.

Very truly yours,



Vivienne J Alston

J-SANDCASTLE CO LLC
C/O QIP MANAGEMENT
3334 E. COAST HWY. #126
CORONA DEL MAR, CA 92625
714-321-3449

June 4, 2021

RE Ground Space Payment #376

Space/Ground Rent Received on June 4, 2021 \$1100.00 CASH gave to Rancho Del Rey Manager
in Office located at 16222 Monterey Lane at 3:46pm.

Please credit to the account of J-Sandcastle Co LLC for our home located at APN 178-011-16
identified as APN-891-569-62 LBM 1081.

Sincerely,

/s/

Steven Gallian, Director
QIP Management



TO :

Gallian, Jamie and J-Sandcastle Co. LLC
16222 Monterey Ln. SPC 376
Huntington Beach, CA 92649

Dear Jamie Gallian and J-Sandcastle Co. LLC,

At this time we are unable to accept your payment of \$1,100.⁰⁰ received on
6/7/2021 in cash due to the current legal proceedings and being that you are
not a registered resident of Space #376.

Sincerely,

Chris Houser
Rancho Del Rey Mobile Home Estates

July 1, 2021

Payment of \$1100.00 in cash of Ground Space Rent Lot 376.

Payment for hand delivered to Rancho Del Rey Offices

Jamie Gallian, its Member, J-Sandcastle Co LLC.

Signed this 1st day of July 2021, at Huntington Beach, CA 92649.

 7/1/21

JAMIE L. GALLIAN, Member, J-Sandcastle Co LLC

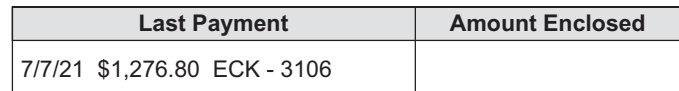


Statement

Billing Period	Statement Date
07/02/21 - 08/01/21	07/27/21

Property	Unit	Type	Acc #
RDR	SPC 379	Lot	425

Previous Balance	Current Charges	Current Credits	Balance Due
1,268.19	1,289.43	1,276.80	1,285.07



Date	Reference	Description	Amount
07/07/21	ECK - 3106	Previous Balance	1,268.19
08/01/21		Payment Received	-1,276.80
		Electric Utility	29.00
	Readings:	Current: 07/22/21 - 770 Previous: 06/22/21 - 605 Usage: 165	
08/01/21		Gas Utility	4.36
	Readings:	Current: 07/22/21 - 518 Previous: 06/22/21 - 518 Usage: 0	
08/01/21		Water & Sewer	44.62
	Readings:	Current: 07/22/21 - 1196 Previous: 06/22/21 - 1193 Usage: 3	
08/01/21		Garbage Fee	19.45
08/01/21		Rent Charge	1,192.00
Sub Total			1,280.82
Unapplied Credits			4.25
Balance Due			1,285.07

ELECTRIC		CARE	GAS	CARE	WATER & SEWER	
KWH: 165	Daily Baseline KWH: 11.4		Therms(T): 0 x 1.033 = 0		3 CCF ~ 2244 Gallons	
Basic Charge	0.0240 x 30 days	\$0.72	Daily Baseline Therms: 0.4240		Meter Charge	0.4867 x 30 days \$14.60
T1 0-100%	0.1331 x 165 kwh	\$21.96	Daily 0.16438 x 30 Days	\$4.93	Usage Charge	2.2267 x 3 CCF \$6.68
T2 101-400%	0.1999 x 0 kwh	\$0.00	Baseline 1.22378 x 0 T	\$0.00	Cap Charge	0.0145 x 30 days \$0.44
T3 401%+	0.2752 x 0 kwh	\$0.00	Non Baseline 1.62341 x 0 T	\$0.00		Tax 5% of 6.68 \$0.33
Generation	0.0956 x 165 kwh	\$15.77	Transport Adj 0 x 0.0014	\$0.00	Water Total	\$22.05
	CARE Discount	-10.88	PPPCharge 0.02278 x 0 T	\$0.00	HB Sewer	30 days x 0.2824 \$8.47
	Subtotal	\$27.57	State Reg Fee 0.00577 x 0 T	\$0.00	OCSD	30 days x 0.4699 \$14.10
HB Tax	0.05 x \$27.57	\$1.38	MHP Charge	\$0.21		Total \$44.62
State Fee	0.00030 x 165 kwh	\$0.05		Care Credit \$-0.99		
	Total	\$29.00		SubTotal \$4.15		
				HB Tax 5% \$0.21		
				Total \$4.36		

*Please note that HB Sewer and OCSD Sewer are now billed with Water on a daily rate. You may view the charges under the water calculation.

Rancho Del Rey

Statement

16222 Monterey Ln. OFC
Huntington Beach, California 92649
714-846-1429

Billing Period	Statement Date
6/02/21 - 08/01/21	07/30/21

TO:

GALLIAN, JAMIE LYNN
16222 Monterey Ln. SPC 376
Huntington Beach, CA 92649

Property	Unit	Type	Acc #
RDR	SPC 376	Lot	GALLIAN-376

Previous Balance	Current Charges	Current Credits	Balance Due
1,086.00	1,183.43	0.00	2,269.43

BEGINNING POST BK FILING 7/9/2021, Case 11710

Last Payment	Amount Enclosed
7/30/2021 Check No 2578.	\$2,269.43

PLEASE RETURN TOP PORTION WITH YOUR REMITTANCE

Date	Reference	Description	Amount
07/01/21	Cash Payment	Rent Payment-July, 2021	
07/07/21		Cash Payment Returned to tenant @ Sp. 376	
08/01/21		Electric Utility	29.00
	Readings:	Current: 07/22/21 - Previous: 06/22/21 - Usage:	
08/01/21		Gas Utility	4.36
	Readings:	Current: 07/22/21 - Previous: 06/22/21 - Usage:	
08/01/21		Water & Sewer Includes HB Sewer & OCSD	44.62
	Readings:	Current: 07/22/21 - Previous: 06/22/21 - Usage:	
08/01/21		Garbage Fee Republic Services	19.45
08/01/21		Rent Charge	
		Utility Subtotal	97.43
		August Space 376 Rent	1,086.00
Sub Total			1,183.43
Unapplied Credits			1,086.00
Balance Due			2,269.43

July 2021 ESTIMATED USAGE AMOUNTS

ELECTRIC
KWH: 165 Daily Baseline KWH: 11.4
Basic Charge 0.0240 x 30 days \$0.72
T1 0-100% 0.1331 x 165 kwh \$21.96
T2 101-400% 0.1999 x 0 kwh \$0.00
T3 401%+ 0.2752 x 0 kwh \$0.00
Generation 0.0956 x 165 kwh \$15.77
CARE Discount -10.88
Subtotal \$27.57
HB Tax 0.05 x \$27.57 \$1.38
State Fee 0.00030 x 165 kwh \$0.05
Total \$29.00

GAS
Therms(T): 0 x 1.033 = 0
Daily Baseline Therms: 0.4240
Daily 0.16438 x 30 Days \$4.93
Baseline 1.22378 x 0 T \$0.00
Non Baseline 1.62341 x 0 T \$0.00
Transport Adj 0 x 0.0014 \$0.00
PPPCCharge 0.02278 x 0 T \$0.00
State Reg Fee 0.00577 x 0 T \$0.00
MHP Charge \$0.21
Care Credit \$-0.99
SubTotal \$4.15
HB Tax 5% \$0.21
Total \$4.36

WATER & SEWER
3 CCF ~ 2244 Gallons
Meter Charge 0.4867 x 30 days \$14.60
Usage Charge 2.2267 x 3 CCF \$6.68
Cap Charge 0.0145 x 30 days \$0.44
Tax 5% of 6.68 \$0.33
Water Total \$22.05
HB Sewer 30 days x 0.2824 \$8.47
OCSD 30 days x 0.4699 \$14.10
Total \$44.62

Comments
*Please note that HB Sewer and OCSD Sewer are now billed with Water on a daily rate. You may view the charges under the water calculation.

JAMIE L GALLIAN
PH. 714.312.3449
1136 BUCKINGHAM DR. #B
OOSTA-MESA, CA 92626

2-8152/2710 2578

PAY TO THE ORDER OF Family DE Reg M #5 \$ 2269.43

DATE 7/30/2021

ALLIANTSM
credit union
Chicago, Illinois

MEMO 20.376

2578

743.43

2578

2578





Return of Payment

TO:

Gallian, Jamie and J-Sandcastle Co. LLC
16222 Monterey Ln. SPC 376
Huntington Beach, CA 92649

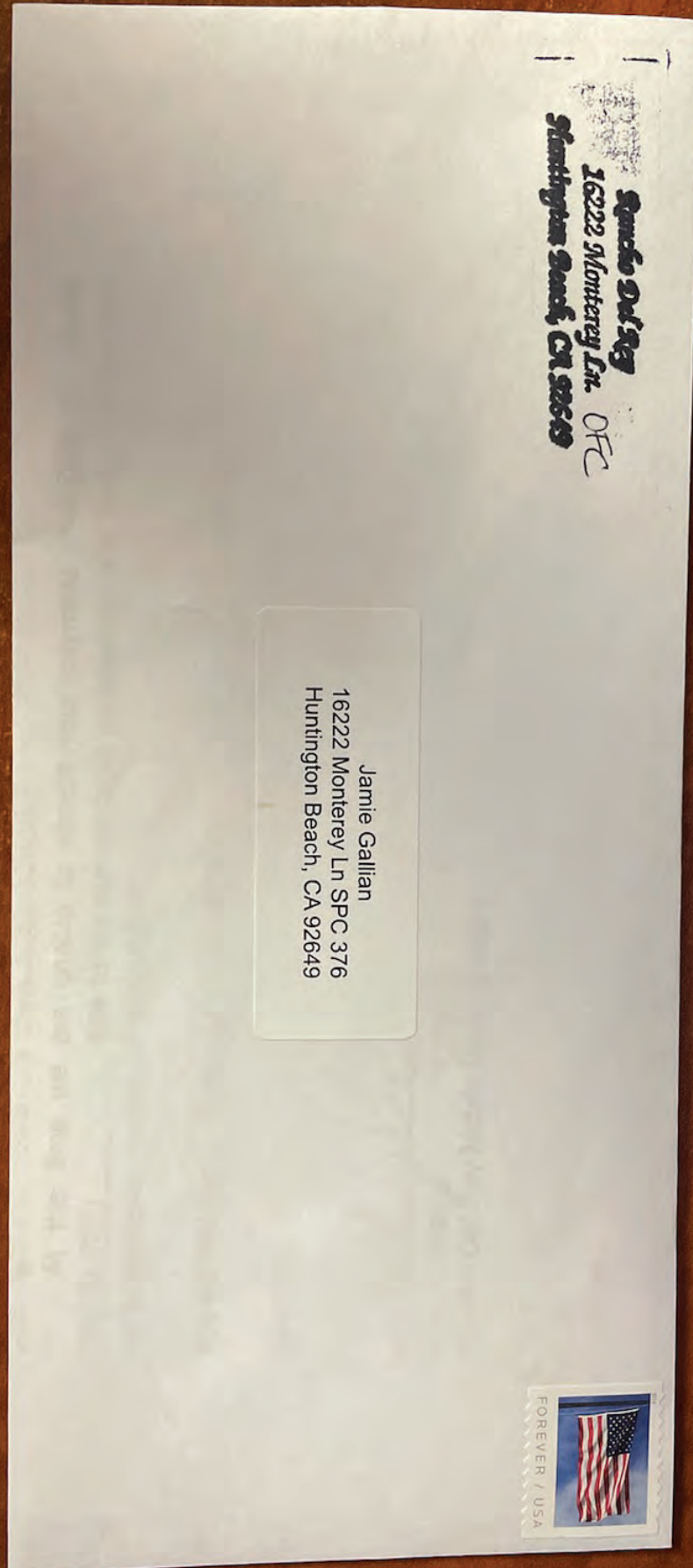
Dear Jamie Gallian and J-Sandcastle Co. LLC,

At this time we are unable to accept your payment of \$2269.43 dated July 30, 2021 due to the current legal proceedings and being that you are not a registered resident of Space #376.

You will find the ☐ Cash ☒ Check # 2578 enclosed.

Sincerely,

Molly Curtiss 7/30/21
Rancho Del Rey Mobile Home Estates





Mailed 7/30/21
Molly Luten

Rancho Del Rey
16222 Monterey Ln. OFC
Huntington Beach, CA 92649



Jamie Gallian
16222 Monterey Ln SPC 376
Huntington Beach, CA 92649

EXHIBIT 24



Shari L. Freidenrich, CPA
Orange County Treasurer - Tax Collector
P.O. BOX 1438 • Santa Ana, CA 92702-1438
601 N. Ross Street, Building 16, Santa Ana
Office Hours: 8:00 AM-5:00 PM Monday - Friday
Phone Hours: 9:00 AM-5:00 PM (714) 834-3411
octreasurer.com/octaxbill

INTERNET COPY

2021-22 SECURED PROPERTY TAX BILL

For Fiscal Year Beginning July 1, 2021 and Ending June 30, 2022

0000210-0000210 PDFE----- 344031 OCT017
**ASSESSEE NAME AND ADDRESS ARE NOT AVAILABLE
ONLINE PER CA GOV CODE §6254.21**

DID YOU KNOW?

Sign up to receive a text/email due date reminder at octreasurer.com/securedreminders
Pay online at octreasurer.com/octaxbill to receive same day credit, no service fee by eCheck and an emailed receipt.
Mailed payments must have a USPS postmark on or before the last timely payment date. If you wait until the last day to mail your payment, get your envelope hand-stamped with a postmark to ensure it is timely. See octreasurer.com/postmarks.

PROPERTY LOCATION

16222 MONTEREY LN 376 HUNTINGTON BEACH

ASSESSED VALUES & EXEMPTIONS AS OF JANUARY 1, 2021

DESCRIPTION	FULL VALUE	COMPUTED TAX
PERSONAL PROPERTY - OTHER	86,339	
TOTAL VALUES:	86,339	946.92
TOTAL NET TAXABLE VALUE:	86,339	946.92

OWNER OF RECORD AS OF 12:01 AM, JANUARY 1, 2021

**ASSESSEE NAME AND ADDRESS ARE NOT AVAILABLE ONLINE PER CA
GOV CODE §6254.21**

MOBILE HOME

PARCEL NO. (APN)	TAX RATE AREA	1st Installment DUE 11/1/21		2nd Installment DUE 2/1/22		TO PAY BOTH INSTALLMENTS BY 12/10/21
891-569-62	04-902	\$473.46	+	\$473.46	=	\$946.92

IMPORTANT INFORMATION

INFORMATION COPY

Taxes were pre-paid at the time of purchase and will be credited towards this tax bill.

VOTER APPROVED TAXES AND SPECIAL ASSESSMENTS

SERVICE AGENCY	RATE	VALUE	TAXES
BASIC LEVY RATE	1.00000	86,339	863.39
COAST COMM COLLEGE DIST	.03119	86,339	26.92
OCEAN VIEW SCHOOL DIST	.02796	86,339	24.14
HUNTINGTON BCH UNION HS	.02260	86,339	19.52
HUNTINGTON BEACH EMPLOYEE RETIREME	.01500	86,339	12.95
TOTAL CHARGED	1.09675		946.92

FOR DETAILS OF TAX TYPES, VISIT OUR WEBPAGE AT OCTREASURER.COM/OCTAXBILL

THERE WILL BE A \$26.00 FEE FOR EACH PAYMENT RETURNED UNPAID BY YOUR BANK FOR ANY REASON

FIRST INSTALLMENT DUE 11/1/21 →	\$.00	SECOND INSTALLMENT DUE 2/1/22 →	\$.00	TOTAL DUE AND PAYABLE →	\$.00
------------------------------------	--------	------------------------------------	--------	----------------------------	--------

THIS IS NOT A BILL

EXHIBIT 25



Shari L. Freidenrich, CPA
Orange County Treasurer - Tax Collector
P.O. BOX 1438 • Santa Ana, CA 92702-1438
601 N. Ross Street, Building 16, Santa Ana
Office Hours: 8:00 AM-5:00 PM Monday - Friday
Phone Hours: 9:00 AM-5:00 PM (714) 834-3411
octreasurer.com/octaxbill

INTERNET COPY

2021-22 SECURED PROPERTY TAX BILL
For Fiscal Year Beginning July 1, 2021 and Ending June 30, 2022
0020256-0020256 PDFE----- 344055 OCT013
**ASSESSEE NAME AND ADDRESS ARE NOT AVAILABLE
ONLINE PER CA GOV CODE §6254.21**

DID YOU KNOW?

Sign up to receive a text/email due date reminder at octreasurer.com/securedreminders

Pay online at octreasurer.com/octaxbill to receive same day credit, no service fee by eCheck and an emailed receipt.

Mailed payments must have a USPS postmark on or before the last timely payment date. If you wait until the last day to mail your payment, get your envelope hand-stamped with a postmark to ensure it is timely. See octreasurer.com/postmarks.

PROPERTY LOCATION
16222 MONTEREY LN 375 HUNTINGTON BEACH

ASSESSED VALUES & EXEMPTIONS AS OF JANUARY 1, 2021			
DESCRIPTION	FULL VALUE	COMPUTED TAX	
PERSONAL PROPERTY - OTHER	42,443		
TOTAL VALUES:	42,443	465.49	
HOMEOWNER EXEMPTION	-7,000	-76.77	
TOTAL NET TAXABLE VALUE:	35,443	388.72	

OWNER OF RECORD AS OF 12:01 AM, JANUARY 1, 2021
ASSESSEE NAME AND ADDRESS ARE NOT AVAILABLE ONLINE PER CA GOV CODE §6254.21

PARCEL NO. (APN)	TAX RATE AREA	1st Installment DUE 11/1/21		2nd Installment DUE 2/1/22		TO PAY BOTH INSTALLMENTS BY 12/10/21
891-563-75	04-902	\$194.36	+	\$194.36	=	\$388.72

IMPORTANT INFORMATION		VOTER APPROVED TAXES AND SPECIAL ASSESSMENTS		
If you sold this property or no longer own it, you can disregard this bill. Property taxes are the responsibility of the new owner. Contact the Office of the Assessor at (714) 834-2727 regarding ownership changes.		SERVICE AGENCY	RATE	TAXES
		BASIC LEVY RATE	1.00000	35,443 354.43
		COAST COMM COLLEGE DIST	.03119	35,443 11.05
		OCEAN VIEW SCHOOL DIST	.02796	35,443 9.91
		HUNTINGTON BCH UNION HS	.02260	35,443 8.01
		HUNTINGTON BEACH EMPLOYEE RETIREME	.01500	35,443 5.32
		TOTAL CHARGED	1.09675	388.72

MH LOCATED IN SPACE 375 ON AP 178-011-16

FO74-453 (2021)

FOR DETAILS OF TAX TYPES, VISIT OUR WEBPAGE AT OCTREASURER.COM/OCTAXBILL

THERE WILL BE A \$26.00 FEE FOR EACH PAYMENT RETURNED UNPAID BY YOUR BANK FOR ANY REASON
RETAIN TOP PORTION FOR YOUR RECORDS - IF PAYING BY CHECK, YOUR CANCELLED CHECK IS YOUR RECEIPT OR PAY ONLINE AND RECEIVE AN EMAILED RECEIPT

DETACH AND MAIL STUB WITH 2ND INSTALLMENT IN ENVELOPE PROVIDED
WRITE YOUR PARCEL NO. ON YOUR CHECK

PARCEL NUMBER (APN)	DELINQUENT AFTER
891-563-75	APRIL 11, 2022

ASSESSEE:
**ASSESSEE NAME AND ADDRESS ARE NOT AVAILABLE ONLINE
PER CA GOV CODE §6254.21**
Make checks payable to: County of Orange

COUNTY OF ORANGE
ATTN: TREASURER-TAX COLLECTOR
P.O. Box 1438
Santa Ana, CA 92702-1438

INTERNET COPY

AMOUNT DUE AFTER 4/11/22 (INCLUDES 10% PENALTY + \$23 COST)

ORANGE COUNTY 2021-22 PROPERTY TAX

Pay taxes online by eCheck or by credit card

eCheck No Cost

VISA - 2.29% Fee Min. \$1.95

Scan the code to view and pay your specific parcel online octreasurer.com/octaxbill



DUE FEB 1, 2022

\$194.36

\$236.79

0189156375000012021020411220000019436063022000002367900000000000000008

DETACH AND MAIL STUB WITH 1ST INSTALLMENT IN ENVELOPE PROVIDED
WRITE YOUR PARCEL NO. ON YOUR CHECK

PARCEL NUMBER (APN)	DELINQUENT AFTER	TO PAY BOTH INSTALLMENTS BY DEC. 10
891-563-75	DECEMBER 10, 2021	\$388.72

ASSESSEE:
**ASSESSEE NAME AND ADDRESS ARE NOT AVAILABLE ONLINE
PER CA GOV CODE §6254.21**
Make checks payable to: County of Orange

COUNTY OF ORANGE
ATTN: TREASURER-TAX COLLECTOR
P.O. Box 1438
Santa Ana, CA 92702-1438

INTERNET COPY

AMOUNT DUE AFTER 12/10/21 (INCLUDES 10% PENALTY)

ORANGE COUNTY 2021-22 PROPERTY TAX

Pay taxes online by eCheck or by credit card

eCheck No Cost

VISA - 2.29% Fee Min. \$1.95

Scan the code to view and pay your specific parcel online octreasurer.com/octaxbill



DUE NOV 1, 2021

\$194.36

\$213.79

0189156375000012021011210210000019436063022000002137900000000000000006

EXHIBIT 26

Department of Housing and Community Development
Division of Codes and Standards
Registration and Titling Program



Private Party Sale for a Home on Local Property Tax with HCD Certificate of Title

HCD RT 804 (Rev. 10/20)

IMPORTANT: Please return this letter with the items requested below to the address listed on side 2.

The following are instructions on how to transfer ownership of a manufactured home or mobilehome sold by someone other than a licensed California dealer when all the following apply:

- 1) The home is titled with HCD.
- 2) The home is subject to local property taxation (LPT) and bears an HCD decal number that begins with the letter "L."

In order to transfer ownership of a home meeting the above criteria, the following documents and fees must be submitted to the address listed on side 2 of this letter:

- 1) The original HCD Certificate of Title signed off by all owners printed on the title. The new owners should complete the "New Owner Information" area and sign where appropriate. If the original title has been lost, an [Application for Duplicate Certificate of Title \(form HCD RT 480.4\)](#) can be completed and submitted with a \$25 duplicate fee.
- 2) The original last-issued registered owner's Registration Card or, if lost, an [Application for Duplicate Registration Card \(form HCD RT 481.2\)](#) completed and submitted with a \$25 duplicate fee.
- 3) A valid original Tax Clearance Certificate (not your tax bill) issued by the County Tax Collector where the home is located. The new buyers should be shown as the Applicant on this form.

For a list of County Tax Collector contact numbers, please visit the [California Board of Equalization's Listing of County Tax Collectors](#) or call (800) 952-8356 for further assistance.

- 4) [Multi-Purpose Transfer Form \(form HCD RT 476.6G\)](#) completed in appropriate sections and signed by all new buyers.

- 5) Transfer Fee \$35
Transfer Fee Penalty \$25
..... (due if postmarked 20 days after date of sale)
Mobilehome Recovery Fund Fee \$10 (due for each sale after January 1, 2008)
Registration Fee..... \$23 per section
Registration Fee Penalty..... \$3 per section
..... (due if postmarked 20 days after date of sale)
Park Purchase Fee \$5 per section (not due if buyer owns the land)
Lien Registration Fee..... \$25
..... (due if adding, changing, or deleting a lender)
Duplicate Title Fee \$25 (due if duplicate submitted)
Duplicate Registration Card Fee \$25 (due if duplicate submitted)

Make **CHECK** or **MONEY ORDER** payable to **HCD** and show the **DECAL NUMBER**.

Please mail to: HCD
P.O. Box 277820
Sacramento, CA 95827-7820

Basic transfer requirements and fees must be postmarked and/or received by HCD within 20 calendar days from the date of sale to avoid transfer penalties.

If, after a review of your application, additional fees and/or documents are required, your application will be returned to you with further instructions for completing your transaction.

If you have any questions regarding the above requirements or forms, please contact HCD at (800) 952-8356 or ContactRT@hcd.ca.gov for assistance.

Visit HCD's website for a list of [DISTRICT OFFICES](#) or call (800) 952-8356.

EXHIBIT 27

5/12/22, 6:20 PM

Pay Fees — Submit a Payment - CASAS



California Department of Housing and Community Development

Codes and Standards Automated System (CASAS)

Select Language ▼

Powered by Google Translate

[Home](#)

Pay Fees — Submit a Payment

You can now pay fees — submit a payment for any Codes and Standards transactions that require payment.

For example:

- Manufactured home/mobilehome title transfers
- Duplicate titling documents
- Permit and inspection fees
- Mobilehome/RV park permits to operate
- Employee housing permits to operate
- Occupational license renewals
- Any other Codes and Standards-related transaction that requires payment

Before you begin, you will need:

1. Your document tracking number (DTN)
2. Zip code related to this application
3. A valid VISA or Mastercard credit card and billing information



* Indicates Required Field

Document Tracking Number

(DTN)

*

Zip Code *



I'm not a robot

reCAPTCHA
[Privacy](#) - [Terms](#)

[Continue](#)

[Clear Form](#)

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **NOTICE OF MOTION AND MOTION OBJECTING TO DEBTOR'S CLAIMED HOMESTEAD EXEMPTION** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **May 12, 2022**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**: On **May 12, 2022**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR

JAMIE LYNN GALLIAN
16222 MONTEREY LN UNIT 376
HUNTINGTON BEACH, CA 92649

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL**: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **May 12, 2022**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

PURSUANT TO THE COURTROOM POLICIES AND PROCEDURES OF THE HONORABLE ERITHE A. SMITH, COURTROOM 5A, §VIII. JUDGES' OR COURTESY COPIES, EXCEPT FOR DOCUMENTS 200 PAGES OR OVER, INCLUDING EXHIBITS, JUDGE SMITH **DOES NOT** REQUIRE JUDGES' COPIES.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

May 12, 2022
Date

Layla Buchanan
Printed Name

/s/ Layla Buchanan
Signature

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** CONTINUED:

- **ATTORNEY FOR TRUSTEE JEFFREY I GOLDEN (TR):** Aaron E DE Leest adeleest@DanningGill.com, danninggill@gmail.com; adeleest@ecf.inforuptcy.com
- **ATTORNEY FOR CREDITOR and PLAINTIFF THE HUNTINGTON BEACH GABLES HOMEOWNERS ASSOCIATION:** Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com; goeforecf@gmail.com
- **TRUSTEE JEFFREY I GOLDEN (TR):** Jeffrey I Golden (TR lwerner@wglp.com, jig@trustesolutions.net; kadele@wglp.com
- **ATTORNEY FOR PLAINTIFF HOUSER BROS. CO.:** D Edward Hays ehays@marshackhays.com, ehays@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com
- **ATTORNEY FOR CREDITOR and PLAINTIFF THE HUNTINGTON BEACH GABLES HOMEOWNERS ASSOCIATION:** Brandon J Iskander biskander@goeforlaw.com, kmurphy@goeforlaw.com
- **ATTORNEY FOR TRUSTEE JEFFREY I GOLDEN (TR):** Eric P Israel eisrael@DanningGill.com, danninggill@gmail.com; eisrael@ecf.inforuptcy.com
- **ATTORNEY FOR PLAINTIFF HOUSER BROS. CO.:** Laila Masud lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com
- **ATTORNEY FOR DEFENDANT RANDALL L NICKEL:** Mark A Mellor mail@mellorlawfirm.com, mellormr79158@notify.bestcase.com
- **INTERESTED PARTY COURTESY NEF:** Valerie Smith claims@recoverycorp.com
- **U.S. TRUSTEE:** United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov

EXHIBIT 2

178-771-03

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CONDOMINIUM

INDEX, TRACT NO. 10542

INDEX, TRACT NO. 10542

PROJECT NO. 937-63 TRACT NO. 10542 NO. LOTS 2 A.P. NO. 178-771-03

PROJECT NO. 937-63

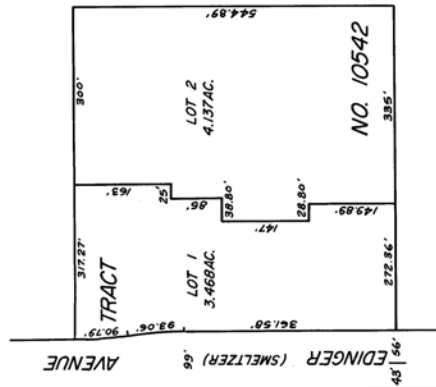
Billing No.	Located on Lot	Unit No.	Common Area
937-63-001	Lot 2	1	Und 1/80 Int in Lots 1 & 2
937-63-002	"	2	"
937-63-003	"	3	"
937-63-004	"	4	"
937-63-005	"	5	"
937-63-006	"	6	"
937-63-007	"	7	"
937-63-008	"	8	"
937-63-009	"	9	"
937-63-010	"	10	"
937-63-011	"	11	"
937-63-012	"	12	"
937-63-013	"	13	"
937-63-014	"	14	"
937-63-015	"	15	"
937-63-016	"	16	"
937-63-017	"	17	"
937-63-018	"	18	"
937-63-019	"	19	"
937-63-020	"	20	"
937-63-021	"	21	"
937-63-022	"	22	"
937-63-023	"	23	"
937-63-024	"	24	"
937-63-025	"	25	"
937-63-026	"	26	"
937-63-027	"	27	"
937-63-028	"	28	"
937-63-029	"	29	"
937-63-030	"	30	"
937-63-031	"	31	"
937-63-032	"	32	"
937-63-033	"	33	"
937-63-034	"	34	"
937-63-035	"	35	"
937-63-036	"	36	"
937-63-037	"	37	"
937-63-038	"	38	"
937-63-039	"	39	"
937-63-040	"	40	"

Billing No.	Located on Lot	Unit No.	Common Area
937-63-041	Lot 1	41	Und 1/80 Int in Lots 1 & 2
937-63-042	"	42	"
937-63-043	"	43	"
937-63-044	"	44	"
937-63-045	"	45	"
937-63-046	"	46	"
937-63-047	"	47	"
937-63-048	"	48	"
937-63-049	"	49	"
937-63-050	"	50	"
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937-63-056	"	56	"
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937-63-058	"	58	"
937-63-059	"	59	"
937-63-060	"	60	"
937-63-061	"	61	"
937-63-062	"	62	"
937-63-063	"	63	"
937-63-064	"	64	"
937-63-065	"	65	"
937-63-066	"	66	"
937-63-067	"	67	"
937-63-068	"	68	"
937-63-069	"	69	"
937-63-070	"	70	"
937-63-071	"	71	"
937-63-072	"	72	"
937-63-073	"	73	"
937-63-074	"	74	"
937-63-075	"	75	"
937-63-076	"	76	"
937-63-077	"	77	"
937-63-078	"	78	"
937-63-079	"	79	"
937-63-080	"	80	"

PROJECT 937-63
LOCATED ON A.P. 178-771-03



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EDINGER AVE (SMELTZER AVE)

LOLITA LN

NANGITA LN

SAYBROOK LN

CRETE LN

ST-DR

More

Clear

178-771-03



Assessor Map Assessor Map Index

Assessment No.	178-771-03
Lot Name	1
Legal Start Date	8/17/1979
Lot Type	Lot
Doc. No.	MM 456/49-50
Map No.	TR 10542
Doc. Ref. No.	
Doc. Ref. Date	
Legal Descr.	N TR 10542 LOT 2 UNIT SEE CONDOMINIUM OF PROJECT LISTED UNDER 937-63-001 TH RU 80
Landuse	RMOB

EDINGER AVE (SMELTZER AVE)

LOLITA LN

NANCITA LN

SAYBROOK LN

CRETE LN

T-DR

More

Clear

178-771-03

[Assessor Map](#) [Assessor Map Index](#)

Assessment No.	178-771-03
Lot Name	2
Legal Start Date	8/17/1979
Lot Type	Lot
Doc. No.	MM 456/49-50
Map No.	TR 10542
Doc. Ref. No.	
Doc. Ref. Date	
Legal Descr.	N TR 10542 LOT 2 UNIT SEE CONDOMINIUM OF PROJECT L ISTED UNDER 937-63-001 TH RU 80
Landuse	RMOB

EXHIBIT 3

THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

DEPARTMENT C-8

SANDRA BRADLEY,) CASE NO. 2017-00924559
)
PETITIONER,)
)
JAMIE GALLIAN,)
)
RESPONDENT.)
_____)

THE HONORABLE KIM HUBBARD, JUDGE PRESIDING

REPORTER'S TRANSCRIPT OF PROCEEDINGS

JULY 20, 2017

APPEARANCES OF COUNSEL

FOR PETITIONER: ROSS WERSCHING & WOLCOTT, LLP
BY: GIANNA GRUENWALD
ATTORNEY AT LAW

FOR RESPONDENT: CHRISTOPHER BLANK
ATTORNEY AT LAW

LISA A. AUGUSTINE, RPR, CSR #10419
OFFICIAL COURT REPORTER

I N D E X

<u>WITNESSES</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
SANDRA BRADLEY	5	40	77	
	90			
JAMIE LYNN GALLIAN	79	86		

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I N D E X

FOR

IN

JOINT EXHIBITS:

IDENTIFICATION

RECEIVED

3 -	35
4 -	35
5 -	35
6 -	15
7 -	20
8 -	24
9 -	25
10 -	26
11 -	29
12 -	31
13 -	32
14 -	34

SANTA ANA, CALIFORNIA - THURSDAY, JULY 20, 2017

MORNING SESSION

* * * * *

(THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN
COURT:)

THE COURT: BACK ON BRADLEY. APPEARANCES.

MS. GRUENWALD: GOOD MORNING, YOUR HONOR. GIANNA
GRUENWALD FOR PETITIONER SANDRA BRADLEY.

MR. BLANK: GOOD MORNING, YOUR HONOR. CHRISTOPHER
BLANK, B-L-A-N-K, ON BEHALF OF THE RESPONDENT JAMIE GALLIAN.

THE COURT: MISS GRUENWALD, WOULD YOU LIKE TO
PROCEED?

MS. GRUENWALD: YES. MY FIRST WITNESS, YOUR HONOR,
IS MY CLIENT SANDRA BRADLEY.

THE COURT: ALL RIGHT.

THE CLERK: DO YOU SOLEMNLY STATE THE TESTIMONY
YOU'RE ABOUT TO GIVE IN THE CASE NOW PENDING BEFORE THIS
COURT SHALL BE THE TRUTH, THE WHOLE TRUTH, AND NOTHING BUT
THE TRUTH SO HELP YOU GOD.

THE COURT: YES.

THE CLERK: PLEASE STATE YOUR NAME FOR THE RECORD.

THE WITNESS: SANDRA BRADLEY.

MR. BLANK: YOUR HONOR, THERE IS ANOTHER PERSON IN
THE COURTROOM. AND I UNDERSTAND SHE'S NOT A WITNESS. I
JUST WANT TO CONFIRM THAT BECAUSE IF SHE'S A WITNESS SHE
OUGHT TO BE EXCLUDED.

1 THE COURT: OF COURSE. BUT I THINK I ALREADY ASKED
2 THAT QUESTION.

3 IS THE PERSON A WITNESS?

4 MS. GRUENWALD: NO, YOUR HONOR. SHE'S MY CLIENT'S
5 FRIEND AND IS JUST HERE FOR EMOTIONAL SUPPORT.

6 THE COURT: VERY WELL. GO AHEAD.

7 MR. BLANK: THANK YOU.

8 SANDRA BRADLEY,
9 CALLED AS A WITNESS ON HER OWN BEHALF AND HAVING BEEN FIRST
10 DULY SWORN WAS EXAMINED AND TESTIFIED AS FOLLOWS:

11

12 **DIRECT EXAMINATION**

13

14 MS. GRUENWALD: Q GOOD MORNING, MISS BRADLEY.
15 HOW OLD ARE YOU?

16 A 67.

17 Q WHERE DO YOU LIVE?

18 A IN COTO DE CAZA, CALIFORNIA.

19 Q AND HOW LONG HAVE YOU LIVED THERE?

20 A 8.5 YEARS. I'VE LIVED IN THIS HOUSE 8.5
21 YEARS BUT COTO ABOUT 20 YEARS.

22 Q ARE YOU MARRIED?

23 A I'M WIDOWED.

24 Q WHEN DID YOUR HUSBAND DIE?

25 A 17 YEARS AGO.

26 Q SO THAT WOULD BE THE YEAR 2000?

1 A YES. JUNE 18TH.

2 Q JUNE 18TH, 2000?

3 A YES.

4 Q WHAT WAS YOUR HUSBAND'S NAME?

5 A CHARLES J. BRADLEY.

6 Q AND YOU REFER TO HIM AS CHUCK; CORRECT?

7 A YES.

8 Q FOR EASE OF REFERENCE WE'LL REFER TO HIM AS
9 CHUCK FOR THESE PROCEEDINGS?

10 A THANK YOU.

11 Q HOW LONG WERE YOU MARRIED TO CHUCK?

12 A 24 YEARS.

13 Q AND HOW DID HE DIE?

14 A AUTOMOBILE ACCIDENT IN MONTANA.

15 Q HOW DO YOU KNOW THE RESPONDENT JAMIE GALLIAN?

16 A SHE WAS CHUCK'S STEP DAUGHTER.

17 Q DID YOU HAVE ANY CONTACT WITH MISS GALLIAN
18 DIRECTLY AFTER CHUCK'S DEATH?

19 A YES.

20 Q AND WHAT WAS THE NATURE OF THAT CONTACT?

21 A WELL, I WAS IN THE CAR TOO, SO I WAS INJURED,
22 SO I'M NOT THE ONE THAT CALLED HER AND TOLD HER. BUT ONCE I
23 GOT -- I MEAN -- SHE TALKED TO ME WHEN I WAS IN THE
24 HOSPITAL.

25 Q OKAY. AND DID YOU HAVE ANY DISCUSSIONS WITH
26 MISS GALLIAN ABOUT CHUCK'S ESTATE AFTER HE PASSED AWAY?

1 A AFTER I GOT HOME FROM MONTANA SHE CALLED ME
2 AND DEMANDED 1/4 OF THE ESTATE. AND I TOLD HER -- SHE SAID
3 SHE WAS SENDING AN ATTORNEY TO SEE ME. AND I SAID IF YOU DO
4 THAT YOU WILL NEVER SEE ME AGAIN, YOUR CHILDREN WON'T SEE
5 ME, AND YOU WON'T GET A DIME. AND THAT WAS THE END OF THAT
6 CONVERSATION. AND THAT WAS THE END OF THAT WHOLE
7 DISCUSSION.

8 Q OKAY. AND WHO ARE MISS GALLIAN'S CHILDREN?

9 A JUSTIN BARKLEY, STEVEN GALLIAN AND BRIAN
10 GALLIAN.

11 Q AND DO YOU HAVE A RELATIONSHIP WITH THEM?

12 A YES.

13 Q AND WHAT'S THE NATURE OF THAT RELATIONSHIP?

14 A I'M THEIR GRANDMOTHER.

15 Q OKAY. AND WHAT WAS YOUR RESPONSE WHEN MISS
16 GALLIAN ASKED YOU FOR THE -- 25% OF THE ESTATE?

17 A I TOLD YOU --

18 Q THAT WAS THE EXTENT OF YOUR RESPONSE?

19 A YES.

20 Q AND IF YOU COULD TURN, PLEASE, THERE'S A
21 WHITE EXHIBIT BOOK IN FRONT OF YOU. IF YOU COULD OPEN IT
22 AND TURN TO TAB 6.

23 MR. BLANK: YOUR HONOR, I OBJECT ON RELEVANCE
24 GROUNDS. I'M NOT SURE WHAT THIS ACCOUNTING HAS TO DO WITH
25 THE RESTRAINING ORDER.

26 THE COURT: WELL UNTIL SHE ASKS SOME QUESTIONS

1 NEITHER DO I. SO OVERRULED AT THIS TIME.

2 MR. BLANK: GOT IT.

3 BY MS. GRUENWALD: Q NOW AFTER MISS GALLIAN
4 ASKED YOU FOR 25% OF THE ESTATE, DID YOU PROVIDE HER WITH
5 ANY GIFTS?

6 A YES.

7 MR. BLANK: OBJECTION. RELEVANCE.

8 THE COURT: OVERRULED.

9 BY MS. GRUENWALD: Q DO YOU RECOGNIZE THE
10 DOCUMENT THAT'S AT EXHIBIT 6?

11 A YES, I PREPARED IT.

12 Q YOU PREPARED IT?

13 A YES.

14 Q AND CAN YOU GENERALLY DESCRIBE WHAT IT IS?

15 A IT'S A LIST OF EVERYTHING THAT MY HUSBAND,
16 BEFORE HE PASSED AWAY, AND ME AFTER HE PASSED AWAY, GAVE
17 HER.

18 Q OKAY. SO IF -- I NOTICE ON THE LEFT-HAND
19 COLUMN THERE'S SOME DATES. IF THE DATE IS AFTER 2000 THOSE
20 WOULD BE GIFTS THAT YOU PROVIDED TO MISS GALLIAN AFTER YOUR
21 HUSBAND'S DEATH?

22 A YES.

23 Q IF YOU GO ABOUT HALFWAY DOWN ON THE FIRST
24 PAGE OF THAT EXHIBIT IT SAYS DECEMBER 2009 PURCHASE OF 4476
25 ALDERPORT. DO YOU SEE THAT THERE?

26 A YES.

1 Q WHAT IS 4476 ALDERPORT?

2 A IT'S A CONDO THAT I PURCHASED FOR JAMIE TO
3 LIVE IN.

4 Q AND DOES SHE LIVE THERE?

5 A YES, AS FAR AS I KNOW.

6 Q UM, AND DID YOU PURCHASE THAT CONDO SOLELY
7 FOR HER BENEFIT?

8 A YES, AND I SINCE HAVE GIFTED IT TO HER.

9 Q OKAY. AND WHEN YOU INITIALLY PURCHASED THE
10 CONDO WAS THE CONDO IN YOUR NAME OR HER NAME?

11 A IT WAS IN MY NAME. AND THEN I PUT IT INTO
12 THE TRUST.

13 Q YOUR TRUST.

14 A MY TRUST.

15 Q OKAY. AND DID SHE MAKE ANY PAYMENTS FOR THAT
16 CONDO?

17 A SHE MADE -- IN THE BEGINNING SHE MADE SOME
18 CONTRIBUTION TOWARDS PROPERTY TAXES AND LAND LEASE AND SHE
19 PAID THE HOA FEES MOST OF THE TIME.

20 Q OKAY. CAN YOU TELL ME WHAT YOU MEAN WHEN YOU
21 SAID SHE PAID THE LAND LEASE?

22 A THE PROPERTY IS ON LAND LEASE AND IT'S ABOUT
23 \$8,000 A YEAR.

24 Q OKAY. SO ON YOUR SPREADSHEET HERE YOU HAVE
25 THAT YOU PURCHASED THE CONDO FOR \$205,000. THAT WAS THE
26 INITIAL PAYMENT THAT YOU MADE?

1 A YES.

2 Q AND THEN EVERYTHING IN THE SPREADSHEET THAT
3 SAYS LAND LEASE, THOSE ARE THE QUARTERLY PAYMENTS DUE ON THE
4 CONDO?

5 A YES.

6 Q OKAY. AFTER YOU GAVE THE CONDO -- FIRST, WHY
7 DID YOU PURCHASE THE CONDO FOR MISS GALLIAN?

8 A SHE WAS HAVING FINANCIAL DIFFICULTIES, AND I
9 FELT THAT IT WOULD HELP HER GET OUT FROM UNDER HER FINANCIAL
10 DIFFICULTIES.

11 Q OKAY. AND WHAT WAS THE NATURE OF YOUR
12 RELATIONSHIP WITH MISS GALLIAN AT THE TIME YOU BOUGHT THE
13 CONDO FOR HER?

14 A WE HAD A GOOD RELATIONSHIP.

15 Q AT SOME POINT DID THE NATURE OF YOUR
16 RELATIONSHIP CHANGE AFTER YOU BOUGHT THE CONDO?

17 A YES.

18 Q AND IN WHAT WAY DID IT CHANGE?

19 A UM, SHE WOULD BLAME ME FOR THINGS THAT WERE
20 OR WEREN'T MY RESPONSIBILITY. AND IT JUST KIND OF WENT
21 DOWNHILL AND ESPECIALLY IN THE LAST YEAR.

22 Q AND WHAT KIND OF THINGS DID SHE BLAME YOU
23 FOR?

24 A I CAN'T COME UP WITH ANYTHING OFF THE TOP OF
25 MY HEAD OTHER THAN EVERYTHING THAT'S BEEN BAD IN HER LIFE
26 HAS BEEN RESULTING FROM MY HUSBAND'S DEATH AND SOME OTHER

1 THINGS THAT HAVE HAPPENED TO HER. AS FAMILY I TRIED TO BE
2 SUPPORTIVE OF HER, BUT, AGAIN, MOST OF THE TIME THINGS WERE
3 MY FAULT.

4 Q OKAY. NOW YOU TESTIFIED YOU EVENTUALLY
5 TRANSFERRED THE CONDO INTO MISS GALLIAN'S NAME; IS THAT
6 CORRECT?

7 A YES, I GIFTED IT TO HER.

8 Q IS THAT SOMETHING THAT SHE ASKED YOU? DID
9 SHE ASK YOU TO PUT THE CONDO IN HER NAME?

10 A SHE ASKED ME ON NUMEROUS OCCASIONS TO PUT HER
11 NAME ALONGSIDE OF MY NAME ON THE DEED ALTHOUGH IT'S NOT
12 REALLY A DEED ON LAND LEASE, BUT SHE WANTED HER NAME AS PART
13 OWNER, AND I DIDN'T FEEL THAT WAS IN MY BEST INTEREST. SO
14 AT SOME POINT I DECIDED I JUST HAD ENOUGH. HERE. TAKE IT.
15 THIS WILL BE THE LAST THING YOU GET FROM ME AND LEAVE ME
16 ALONE.

17 Q AND WHEN YOU HAD THESE CONVERSATIONS WITH HER
18 ABOUT, YOU KNOW, HER WANTING TO HAVE THE CONDO -- HER NAME
19 ALSO ON THE CONDO, WHAT WAS HER RESPONSE AFTER YOU TOLD HER
20 NO?

21 A WELL, BECAUSE IT WAS IN MY TRUST I COULDN'T
22 REALLY CHANGE -- I COULDN'T REALLY CHANGE IT, BUT SHE WANTED
23 IT BECAUSE I THINK -- I THINK SHE WANTED TO BE ON THE BOARD
24 OF THE HOMEOWNERS ASSOCIATION. SO SHE COULDN'T BE ON THE
25 BOARD WITHOUT HER NAME ON THE TITLE.

26 THE COURT: ALL RIGHT. MA'AM, I'M GOING TO ASK YOU,

1 AS I DO WITH ALL WITNESSES, PLEASE LISTEN CAREFULLY TO THE
2 QUESTION ASKED AND ANSWER THAT QUESTION.

3 THE WITNESS: OKAY.

4 MS. GRUENWALD: SO COULD WE HAVE THE LAST QUESTION
5 READ BACK, PLEASE.

6 THE COURT: YES.

7 (WHEREUPON THE RECORD WAS READ.)

8 THE WITNESS: WELL, HER RESPONSE -- HER LAST
9 RESPONSE WAS TAKE IT OUT OF THE TRUST SO THAT YOU COULD DO
10 THAT.

11 BY MS. GRUENWALD: Q AND DID SHE HARASS YOU
12 TO PUT HER NAME IN THE CONDO?

13 A PARDON?

14 MR. BLANK: OBJECTION. LEADING.

15 THE COURT: SUSTAINED.

16 BY MS. GRUENWALD: Q WHEN SHE WAS ASKING TO
17 HAVE HER NAME PUT IN THE CONDO, WHAT WAS THE TONE OF HER
18 VOICE?

19 MR. BLANK: OBJECTION. INDISTINCT AS TO TIME. I'M
20 NOT SURE WHAT TIMEFRAME WE'RE DEALING WITH HERE.

21 THE COURT: WHAT'S THE TIMEFRAME?

22 BY MS. GRUENWALD: Q YOU HAD SEVERAL
23 CONVERSATIONS ABOUT HER PUTTING -- ABOUT THE CONDO BEING PUT
24 IN HER NAME; CORRECT?

25 A YES.

26 Q AND IN GENERAL, DURING THE TIMEFRAME YOU WERE

1 HAVING THESE CONVERSATIONS, WHAT WAS THE DEMEANOR IN HER
2 VOICE?

3 MR. BLANK: OBJECTION, YOUR HONOR. THE TRO IS BASED
4 ON CONVERSATIONS AND COMMUNICATIONS FROM MARCH 26TH FORWARD
5 AND ACTUALLY I THINK UP TO MAY 26TH. AND SO IF THERE WERE
6 CONVERSATIONS OR WHATEVER HAPPENED BEFORE THAT IT DOESN'T
7 APPEAR TO BE RELEVANT TO THIS TRO BECAUSE THE TRO SAYS THE
8 ONLY THING I'M COMPLAINING ABOUT ARE THE COMMUNICATIONS THAT
9 TOOK PLACE IN THAT TIMEFRAME. SO IF THE QUESTION IS LIMITED
10 TO THAT TIMEFRAME THAT SEEMS RELEVANT TO ME. BUT IF THERE
11 WERE CONVERSATIONS THAT TOOK PLACE A YEAR AGO, TWO YEARS AGO
12 THREE YEARS AGO --

13 THE COURT: IN THESE CASES WE GO BACK FIVE YEARS.

14 MR. BLANK: OKAY. BUT DOESN'T THE PETITIONER HAVE
15 TO ALLEGE THAT? IF PETITIONER IS GOING TO ALLEGE SOMETHING
16 HAPPENED THREE YEARS AGO IT SEEMS RELEVANT TO ME. BUT I
17 THINK WE'RE -- AT LEAST THE TESTIMONY SHOULD BE SOMEWHAT
18 CONSTRAINED BY THE PLEADINGS, AND THE PLEADINGS HAVE A
19 SPECIFIC QUESTION. IT SAYS IS THERE ANYTHING PRIOR TO WHAT
20 YOU TALKED ABOUT HERE THAT CONSTITUTES HARASSMENT THAT
21 YOU'RE COMPLAINING OF AND SHE CHECKED THE BOX THAT SAID NO.

22 THE COURT: THERE'S A POINT THERE.

23 MS. GRUENWALD: WELL, YOUR HONOR, I'M LAYING THE
24 FOUNDATION OF A PATTERN HERE OF SHOWING FURTHER DEMANDS FOR
25 FINANCIAL BENEFIT WHICH ULTIMATELY LED TO THE --

26 THE COURT: AND THAT WAS ALLEGED, I THINK IN THE

1 DECLARATION ALSO, THAT THERE HAD BEEN DEMANDS FOR MONEY
2 SINCE THE DEATH OF HER HUSBAND. I THINK THAT TAKES IT BACK
3 A BIT FURTHER.

4 MR. BLANK: AND WE'LL STIPULATE RIGHT NOW IT'S NOT A
5 DEMAND SPECIFICALLY FOR MONEY. WE'RE TALKING ABOUT TITLE TO
6 THE CONDO. AND WE'LL STIPULATE THERE HAVE BEEN SEVERAL
7 CONVERSATION ABOUT TITLE OF THE CONDO DATING BACK TO WHEN IT
8 WAS FIRST PURCHASED AND THERE WERE STILL -- AND THERE WERE
9 STILL DISPUTES STILL WITH THE HOA.

10 THE COURT: THAT'S FINE TO STIPULATE TO IT, BUT THE
11 TONE AND NATURE OF THE CONVERSATION, I THINK, ARE STILL AT
12 ISSUE.

13 GO AHEAD, COUNSEL.

14 BY MS. GRUENWALD: Q WHAT WAS THE TONE OF THE
15 CONVERSATIONS?

16 A I CAN'T SAY THAT IT WAS A BAD TONE FOR THOSE
17 CONVERSATIONS.

18 Q OKAY. AT SOME POINT DID THE TONE OF THESE
19 CONVERSATIONS CHANGE?

20 A YES.

21 Q AND IN WHAT WAY?

22 A ABOUT THE CONDO YOU MEAN?

23 Q YES.

24 A JUST IN MARCH.

25 Q OKAY. AND IF YOU COULD TURN TO -- WELL,
26 FIRST BACKING UP.

1 YOUR HONOR, I'D LIKE TO ADMIT EXHIBIT 6 INTO
2 EVIDENCE.

3 MR. BLANK: NO OBJECTION, YOUR HONOR.

4 THE COURT: ALL RIGHT. WE WILL ADMIT EXHIBIT 6.
5 ALTHOUGH THE COURT WILL NOTE ANYTHING STATED ON THERE PRIOR
6 TO THE DEATH OF PETITIONER'S HUSBAND IS NOT RELEVANT TO
7 THESE PROCEEDINGS.

8 MS. GRUENWALD: THANK YOU, YOUR HONOR.

9 (WHEREUPON EXHIBIT 6 WAS RECEIVED INTO
10 EVIDENCE.)

11 BY MS. GRUENWALD: Q MISS BRADLEY, IF YOU
12 COULD PLEASE TURN TO EXHIBIT 7. AND JUST TAKE A MINUTE TO
13 LOOK THROUGH THE DOCUMENT. I'M GOING ASK YOU SOME QUESTIONS
14 ABOUT IT?

15 A OKAY.

16 Q DO YOU RECOGNIZE THIS DOCUMENT?

17 A YES.

18 Q WHAT IS IT?

19 A IT'S THE GIFT OF THE CONDO TO JAMIE.

20 Q NOW WHAT ULTIMATELY LED UP TO YOU GIVING THIS
21 CONDO TO HER?

22 A UM, THERE IS -- NOW THERE'S A LAWSUIT FROM
23 THE HOA AGAINST ME, HER AND THE TRUST HAVING TO DO WITH
24 THINGS THAT SHE DID TO THE UNIT THAT -- SOME OF WHICH WERE
25 APPROVED BUT MANY WHICH WERE NOT APPROVED BY THE HOMEOWNERS
26 ASSOCIATION.

1 Q OKAY. AND THAT LAWSUIT IS CURRENTLY PENDING?

2 A YES.

3 Q SO THE HOA HAS SUED BOTH YOU AND MISS
4 GALLIAN?

5 A YES.

6 Q FOR CHANGES THAT SHE MADE TO THE CONDO?

7 A YES.

8 Q AND WERE YOU AWARE OF THOSE CHANGES AT THE
9 TIME THEY WERE BEING MADE?

10 A MOST OF THE TIME I WAS AWARE OF THEM AFTER
11 SHE MADE THEM.

12 Q OKAY. AND WHAT WAS YOUR POSITION OF THOSE
13 CHANGES THAT WERE MADE TO THE CONDO?

14 A WELL, I WAS SUPPORTIVE -- SPECIFICALLY THE
15 PATIO COVER, WHICH IS WHAT STARTED ALL OF THE HOOPLA. AND I
16 WAS SUPPORTIVE OF THE PATIO COVER. SHE THEN PUT A ROOF ON
17 IT, WHICH IS WHAT THE HOA IS NOT HAPPY ABOUT. AND I TRIED
18 TO LET HER HAVE ME REMOVE THE ROOF, AND SHE SAID I'M
19 HANDLING IT, I'M HANDLING IT, DON'T DO IT.

20 Q AND SO THAT'S ONE OF THE REASONS YOU
21 TRANSFERRED THE CONDO TO HER?

22 A YES.

23 Q ANY OTHER REASON?

24 A I JUST WANTED HER OUT OF MY LIFE.

25 Q AND WHY WAS THAT?

26 A BECAUSE OF THE HARASSMENTS THAT SHE --

1 BECAUSE OF HER HARASSMENT TOWARDS ME.

2 Q IN WHAT WAY WAS SHE HARASSING YOU?

3 A IN DECEMBER, AFTER SHE HAD TAKEN HER SON'S
4 EMAIL ACCOUNT IN NOVEMBER AND WROTE EMAILS TO ME PRETENDING
5 TO BE HIM, AND I FOUND OUT ABOUT IT, SAYING LET'S BE NICER
6 TO MOM, AND ALL KINDS OF OTHER THINGS, SHE SAID SHE FELT SHE
7 HAD EVERY RIGHT TO DO THAT BECAUSE SHE NEEDED TO GET TO THE
8 BOTTOM OF WHATEVER OUR PROBLEMS WERE. AND THEN IN DECEMBER
9 SHE LEFT ME A TELEPHONE MESSAGE, WHICH I DON'T HAVE A
10 RECORDING OF, THAT STATED THAT I WILL SHOW UP WHEN YOU LEAST
11 EXPECT ME AT YOUR HOUSE, OR AT YOUR WORK, AND WE'LL HAVE
12 THIS OUT.

13 MR. BLANK: OBJECTION, YOUR HONOR. I'M GOING TO
14 MOVE TO STRIKE ON THE BASIS THIS IS A CONVERSATION WITH NO
15 FOUNDATION AND THAT PREDATES THE TIMEFRAME THAT IS RELEVANT
16 TO OUR TRO. IT'S DECEMBER OF 2016.

17 THE COURT: JUST AS I SAID, WE GO BACK FIVE YEARS
18 AND THERE WERE ALLEGATIONS THERE WAS HISTORY HERE. SO THE
19 COURT DOES LISTEN TO THE HISTORY. I'M SORRY, YOUR OTHER
20 OBJECTION? I DON'T KNOW WHAT YOU MEAN ABOUT NO FOUNDATION.

21 MR. BLANK: SHE SAID SHE'S RECALLING A CONVERSATION
22 BUT WASN'T RECORDED. SHE DOESN'T HAVE A --

23 THE WITNESS: IT WAS RECORDED. I JUST DON'T HAVE A
24 COPY OF THE RECORDING.

25 THE COURT: WHOA. WHOA. MA'AM.

26 THE WITNESS: SORRY.

1 THE COURT: SHE DOES HAVEN'T A COPY OF THE RECORDING
2 SHE CAN STILL TESTIFY TO THE CONVERSATION.

3 MR. BLANK: GOT IT.

4 THE COURT: OVERRULED.

5 BY MS. GRUENWALD: Q SO SHE LEFT YOU A
6 MESSAGE IN DECEMBER SAYING SHE WAS ESSENTIALLY GOING TO
7 EITHER COME TO YOUR HOUSE OR YOUR WORK PLACE AND HAVE IT OUT
8 WITH YOU?

9 A YES.

10 Q OKAY. AND WHAT WAS YOUR RESPONSE OR YOUR
11 FEELING THAT YOU HAD AFTER YOU HEARD THAT MESSAGE?

12 A I WAS AFRAID OF HER.

13 Q WHAT WERE YOU AFRAID OF?

14 A I WAS AFRAID THAT SHE WOULD HARM ME.

15 Q OKAY. AND YOU MENTIONED THAT SHE USED HER
16 SON'S EMAIL PRETENDING SHE WAS HIM TO REACH OUT TO YOU?

17 A YES.

18 Q HOW DID YOU FIND OUT ABOUT THAT?

19 A I CALLED HIM SAYING SOMETHING THAT I HAD SAID
20 WAS -- I NEEDED TO DISCUSS IT WITH HIM. AND HE SAID WHAT
21 ARE YOU TALKING ABOUT? I HAVE NOT SENT YOU ANY EMAILS.

22 MR. BLANK: OBJECTION. HEARSAY.

23 MS. GRUENWALD: MY QUESTION WAS JUST SIMPLY HOW SHE
24 FOUND ABOUT IT. IT GOES TO HER KNOWLEDGE NOT THE TRUTH OF
25 THE MATTER.

26 THE COURT: THAT MIGHT BE TRUE. NOT SURE IT GOES TO

1 TRUTH OF THE MATTER. OVERRULED.

2 MR. BLANK: AS LONG IT'S ONLY USED HOW SHE GOT
3 NOTICE THEN I HAVE NO OBJECTION.

4 THE COURT: IT'S UNDERSTOOD FOR THAT PURPOSE.

5 BY MS. GRUENWALD: Q DID MISS GALLIAN EVER
6 ADMIT TO YOU USING HER SON'S EMAIL WITHOUT HIS PERMISSION?

7 A YES.

8 Q OKAY. YOU NEED TO LET ME WAIT UNTIL I FINISH
9 THE QUESTION.

10 A SORRY.

11 Q OKAY. SO AS A RESULT OF THE HOA AND THESE
12 CONVERSATIONS THAT YOU FOUND TO BE HARASSING, YOU GIFTED THE
13 CONDO TO MISS GALLIAN?

14 A REPEAT, PLEASE.

15 Q AS A RESULT OF THE HOA PROBLEMS AND THIS
16 HARASSMENT, YOU GIFTED THE CONDO TO MISS GALLIAN?

17 A YES.

18 Q AND WHEN YOU GAVE THE CONDO TO HER DID YOU
19 AGREE TO DO ANYTHING ELSE?

20 A I AGREED TO PAY TWO OF THE LAND LEASES THAT
21 WERE DUE AFTER THE DATE OF THE TRANSFER.

22 Q OKAY.

23 A AND I DID MAKE THOSE PAYMENTS.

24 Q OKAY. AND DID -- WHEN YOU GAVE THE CONDO YOU
25 TOLD HER, "THIS IS IT. I'M NOT GIVING YOU ANYTHING ELSE?"

26 A YES.

1 Q OKAY. GOING BACK TO THE EXHIBIT BOOK UNDER
2 TAB 7. IF YOU LOOK ON PAGE 2 OF THAT DOCUMENT THERE'S --
3 LOOKS WHAT APPEARS TO BE YOUR SIGNATURE THERE AND DATED
4 MARCH 22ND, 2017. DO YOU SEE THAT?

5 A YES.

6 Q IS THAT YOUR SIGNATURE?

7 A YES.

8 Q AND YOU SIGNED THIS TRANSFER DEED?

9 A YES.

10 Q OKAY. AND IF YOU COULD GO TO THE VERY LAST
11 PAGE OF THAT SAME EXHIBIT. PLEASE NOTE THE PAGES ARE DOUBLE
12 SIDED. IS THAT MISS GALLIAN'S SIGNATURE THERE?

13 A YES, I'M SURE IT IS TO THE BEST OF MY
14 KNOWLEDGE.

15 Q HAD YOU SEEN HER SIGNATURE ON THINGS BEFORE?

16 A I HAVE BUT I'M NOT SURE IF I REMEMBER
17 CORRECTLY, BUT -- I'M SURE IT IS BECAUSE -- YES.

18 Q OKAY. SO IT WAS MARCH 22ND, 2017, THAT YOU
19 TRANSFERRED THE CONDO TO HER?

20 A YES.

21 MS. GRUENWALD: I'D LIKE TO ADMIT NUMBER 7 INTO
22 EVIDENCE, YOUR HONOR.

23 MR. BLANK: NO OBJECTION.

24 THE COURT: IT WILL BE ADMITTED.

25 (WHEREUPON EXHIBIT 7 WAS RECEIVED INTO
26 EVIDENCE.)

1 BY MS. GRUENWALD: Q AFTER YOU GAVE MISS
2 GALLIAN THE CONDO, DID YOU HAVE ANY FURTHER CONVERSATIONS
3 WITH HER?

4 A YES.

5 Q AND WHAT WERE THE NATURE OF THOSE
6 COMMUNICATIONS?

7 A SHE FILED SUIT -- SHE OPENED PROBATE ON MY
8 HUSBAND'S ESTATE FROM WHEN HE DIED 17 YEARS AGO.

9 Q AND SO DID SHE DISCUSS THAT WITH YOU?

10 A NO, SHE JUST SENT ME THE PAPERWORK.

11 Q OKAY. IF YOU CAN TURN TO EXHIBIT 8. IT IS AN
12 EMAIL STRING BETWEEN MISS GALLIAN AND MISS BRADLEY DATED
13 MARCH -- TOP EMAIL IS MARCH 26TH, 2017, AND THE LAST EMAIL
14 ON THE PAGE IS MARCH 25TH, 2017. MISS BRADLEY, DO YOU SEE
15 AT THE TOP THERE IT SAYS TO SANDY BRADLEY AND THERE'S AN
16 EMAIL ADDRESS?

17 A YES.

18 Q IS THAT YOUR EMAIL ADDRESS?

19 A YES.

20 Q AND ON THE "FROM" LINE IT SAYS JAMIE GALLIAN
21 AND THERE'S AN EMAIL ADDRESS. IS THAT JAMIE'S EMAIL?

22 A YES.

23 Q AND MARCH 26, 2017, THIS WOULD BE AFTER YOU
24 TRANSFER THE CONDO TO HER; CORRECT?

25 A YES.

26 Q AND DID YOU RECEIVE -- I'M JUST GOING TO TALK

1 ABOUT THE FIRST EMAIL HERE THAT'S ON THE TOP OF THE PAGE,
2 THE ONE THAT'S DATED MARCH 26TH AT 12:59 P.M.

3 Q DID YOU RECEIVE THAT EMAIL FROM HER?

4 A YES.

5 Q OKAY. AND DID YOU PRINT THAT EMAIL OUT?

6 A YES.

7 Q AND THIS IS A COPY OF THAT EMAIL?

8 A YES.

9 Q ABOUT HALFWAY DOWN THE EMAIL IT SAYS, AS FAR
10 AS THE LAND LEASE YOU WILL BE RESPONSIBLE FOR THE 2017
11 PAYMENTS. DO YOU KNOW WHAT SHE -- WHAT DID YOU UNDERSTAND
12 THAT TO MEAN?

13 A SHE SAID AFTER -- SHE TOLD ME AFTER I HAD
14 DONE THE TRANSFER THAT I NEEDED TO PAY THE LAND LEASE FOR
15 THE REST OF THE YEAR.

16 Q OKAY. OKAY. AND SINCE SHE MADE THAT DEMAND
17 HAVE YOU MADE ANY ADDITIONAL PAYMENTS TOWARDS THE CONDO?

18 A I MADE TWO OF THE THREE. I MADE TWO OF THE
19 THREE THAT WERE REMAINING.

20 Q OKAY. ON THE BOTTOM OF THE PAGE THERE, FIRST
21 PAGE, IT SAYS THERE'S A MARCH 25TH EMAIL FROM MISS GALLIAN
22 AND IT LOOKS LIKE THIS IS ALSO PART OF THE SAME EMAIL STRING
23 THAT YOU PRINTED OUT; CORRECT?

24 A YES.

25 Q OKAY. AND IF YOU GO TO THE SECOND PAGE OF
26 THE EXHIBIT, ABOUT 7TH PARAGRAPH DOWN, IT SAYS, "YOUR

1 WILLFUL DISHONESTY AND FRAUDULENT BEHAVIOR IS FINALLY GOING
2 TO BE BROUGHT OUT IN A PROBATE COURT. I PROMISE YOU UNTIL
3 THE DAY I DIE I WILL NEVER LET UP. YOU WILL BE PUNISHED AND
4 SANCTIONS, OR BETTER YET THE LOSS OF ATTORNEY COOPERSMITH
5 BAR LICENSE WILL BE ENTERED FOR HIS PART IN THE DECEIT."

6 FOR REFERENCE WHO'S ATTORNEY COOPERSMITH?

7 A HE'S MY TRUST ATTORNEY.

8 Q OKAY. WHAT IS YOUR UNDERSTANDING OF WHAT
9 SHE'S SAYING HERE WHEN SHE WROTE THIS TO YOU?

10 A SHE -- WHAT IS MY UNDERSTANDING? IT'S
11 ANOTHER ONE OF HER THREATS TO ME OF I WILL PURSUE YOU UNTIL
12 THE DAY I DIE. I MEAN TRULY. AND I THINK BECAUSE SHE --
13 THIS WAS JUST BEFORE SHE OPENED THE PROBATE.

14 Q WHAT KIND OF EFFECT DO THESE EMAILS HAVE ON
15 YOU?

16 A THEY UPSET ME TO NO END.

17 Q AND CAN YOU DESCRIBE ANY EMOTIONAL OR
18 PHYSICAL RESPONSE YOU HAVE TO THEM?

19 A WELL, I -- SOMETIMES I START SHAKING AND I
20 HAVE DIFFICULTY SLEEPING.

21 Q THEY BOTHER YOU?

22 A THEY BOTHER ME.

23 Q OKAY.

24 MS. GRUENWALD: YOUR HONOR, I'D LIKE TO ADMIT
25 EXHIBIT 8 INTO EVIDENCE.

26 MR. BLANK: NO OBJECTION.

1 THE COURT: EXHIBIT 8 WILL BE ADMITTED.

2 (WHEREUPON EXHIBIT 8 WAS RECEIVED INTO
3 EVIDENCE.)

4 BY MS. GRUENWALD: Q TURNING TO EXHIBIT 9.
5 TAKE A MINUTE TO REVIEW THIS EMAIL QUICKLY, MISS BRADLEY,
6 AND LET ME KNOW IF YOU RECOGNIZE IT.

7 A I DO.

8 Q AND IS THIS ANOTHER EMAIL YOU RECEIVED FROM
9 MISS GALLIAN?

10 A YES.

11 Q AND THIS ONE IS DATED MARCH 28TH, 2017. DID
12 YOU PRINT THIS OUT FROM YOUR EMAIL?

13 A YES.

14 Q OKAY. UP UNTIL THIS POINT HAD YOU HAD
15 CONVERSATIONS -- BEFORE SHE SENT YOU THE EMAILS WE
16 DISCUSSED, THE ONES THAT WERE AT EXHIBIT 8, HAD YOU TOLD HER
17 TO STOP CONTACTING YOU?

18 A YES. I SAID, WHEN I GAVE HER THE CONDO,
19 "THIS IS THE END. I WANT NO MORE CONTACT WITH YOU."

20 Q OKAY. GOING BACK TO EXHIBIT 9. THE LAST
21 LINE THERE SAYS FURTHER DELAY WILL ONLY RESULT IN
22 UNNECESSARY LEGAL ASSESSMENTS BY THE PROBATE COURT. HAVE
23 YOU RECEIVED ANY NOTICE OF ANY ASSESSMENTS FROM THE PROBATE
24 COURT?

25 A I RECEIVED NOTICE THAT A PROBATE HAS BEEN
26 OBSERVED.

1 Q OKAY. BUT NOTHING DEMANDING ANY PAYMENT FROM
2 YOU FROM THE COURT?

3 A NO.

4 Q OKAY.

5 YOUR HONOR, I'D LIKE TO ADMIT EXHIBIT 9 INTO
6 EVIDENCE.

7 MR. BLANK: NO OBJECTION.

8 THE COURT: NINE IS ADMITTED.

9 (WHEREUPON EXHIBIT 9 WAS RECEIVED INTO
10 EVIDENCE.)

11 BY MS. GRUENWALD: Q GO TO EXHIBIT 10.

12 MISS BRADLEY, DO YOU RECOGNIZE EXHIBIT 10?

13 A YES.

14 Q WHAT IS IT?

15 A A TEXT I RECEIVED FROM JAMIE.

16 Q AND THERE'S SOME WRITING AT THE TOP OF THE
17 PAGE. IT SAYS APRIL 2ND, 2017. IS THAT YOUR WRITING?

18 A THAT'S MY HANDWRITING, YES.

19 Q IS THAT THE DATE OF THE TEXT?

20 A YES.

21 Q YOU PRINTED THIS OUT FROM YOUR PHONE?

22 A YES.

23 Q AT THE BOTTOM OF THE TEXT MESSAGE IT SAYS

24 "HERE'S THE DEAL" - USING YOUR WORDS - "IT'S A ONE-TIME

25 OFFER \$125,000 CASH. THAT IS THE LAND LEASE AMOUNT FOR THE

26 NEXT 15 YEARS. ALSO, I WANT MY DAD'S IVORY COLLECTION AND

1 COIN COLLECTION. IT'S ABOUT THE ONLY THING LEFT OF HIS
2 PERSONAL PROPERTY. YOU SHOULD TAKE THE DEAL. IT WILL COST
3 YOU A LOT MORE IN ATTORNEYS' FEES AND INTEREST DUE FOR THE
4 LAST 17 YEARS OF FRAUDULENT ACTS."

5 WHAT DID YOU UNDERSTAND THAT TO BE?

6 A THAT SHE WAS TRYING TO FORCE ME TO GIVE HER
7 MORE MONEY.

8 Q AND DID YOU GIVE HER MORE MONEY?

9 A NO.

10 MS. GRUENWALD: OKAY. AT THIS TIME I'D LIKE TO
11 REQUEST THAT THE COURT TAKE JUDICIAL NOTICE THAT MISS
12 GALLIAN FILED HER PETITION FOR PROBATE ON APRIL 18TH, 2017.

13 THE COURT: AND WHAT CASE NUMBER, MISS GRUENWALD?

14 MS. GRUENWALD: YOU KNOW WHAT. I APOLOGIZE, YOUR
15 HONOR. I ONLY HAVE THE ELDER ABUSE CASE NUMBER. I WILL GET
16 YOU THE PROBATE CASE NUMBER.

17 THE COURT: I'D HAVE TO BE ABLE TO TAKE A LOOK
18 BEFORE I CAN TAKE A LOOK.

19 MS. GRUENWALD: SURE.

20 I'D LIKE TO ADMIT EXHIBIT 10 INTO EVIDENCE.

21 MR. BLANK: NO OBJECTION.

22 THE COURT: EXHIBIT 10 IS ADMITTED.

23 (WHEREUPON EXHIBIT 10 WAS RECEIVED INTO
24 EVIDENCE.)

25 BY MS. GRUENWALD: Q MOVING TO EXHIBIT 11.

26 MISS BRADLEY, DO YOU RECOGNIZE EXHIBIT 11?

1 A YES.

2 Q AND WHAT IS IT?

3 A IT'S AN EMAIL FROM JAMIE ADVISING THAT SHE'S
4 OPENING PROBATE.

5 Q AND THIS IS DATED APRIL 6TH, 2017. LOOKING
6 AT THE TOP EMAIL, THIRD PARAGRAPH, IT SAYS, "AS ALWAYS I'M
7 AVAILABLE TO DISCUSS ALTERNATIVE SOLUTIONS TO AVOID
8 EMBARRASSING AND HUMILIATING SITUATIONS FOR YOU." DO YOU
9 KNOW WHAT SHE'S TALKING ABOUT THERE?

10 A NO.

11 Q DID SHE EVER TRY TO EMBARRASS YOU OR
12 HUMILIATE YOU?

13 A SHE HAS CALLED A NUMBER OF MY HUSBAND'S
14 FRIENDS.

15 MR. BLANK: OBJECTION. HEARSAY. LACK OF
16 FOUNDATION. I DON'T KNOW HOW SHE KNOWS THAT JAMIE CALLED.

17 THE COURT: FOUNDATION. SUSTAINED.

18 BY MS. GRUENWALD: Q ARE YOU AWARE OF
19 ANYTHING SHE'S DONE TO TRY TO EMBARRASS OR HARASS YOU; YES
20 OR NO?

21 A YES.

22 Q HOW ARE YOU AWARE SHE DID SOMETHING TO TRY TO
23 EMBARRASS OR HARASS YOU?

24 A SOME OF THE PEOPLE SHE CALLED CALLED ME AND
25 TOLD ME.

26 Q OKAY. AND WHO WERE THOSE PEOPLE FROM --

1 THOSE PEOPLE?

2 A THE COMPANY THAT MY HUSBAND WORKED FOR.

3 Q AND WHAT COMPANY WAS THAT?

4 A FLUOR CORPORATION.

5 Q AND DID YOU HAVE A RELATIONSHIP WITH THE
6 PERSONS WHO CONTACTED YOU?

7 A YES.

8 Q YOU WOULD BELIEVE THEM IF THEY CALLED YOU TO
9 TELL YOU?

10 A YES.

11 Q AND HOW LONG WAS YOUR HUSBAND WORKING FOR
12 FLUOR?

13 A 40 YEARS.

14 Q HOW LONG WERE YOU MARRIED TO YOUR HUSBAND?

15 A 24 YEARS.

16 MS. GRUENWALD: I'D LIKE TO ADMIT EXHIBIT 11 INTO
17 EVIDENCE, YOUR HONOR.

18 MR. BLANK: NO OBJECTION.

19 THE COURT: 11 WILL BE ADMITTED. THE COURT WILL
20 TAKE JUDICIAL NOTICE OF THE PETITION FILED ON BEHALF OF MISS
21 GALLIAN. PETITION 4, LETTERS OF ADMINISTRATION IN CASE
22 NUMBER 2017-915711 FILED ON APRIL 18TH, 2017. WE WILL NOT,
23 HOWEVER, TAKE JUDICIAL NOTICE OF ANY HEARSAY STATEMENTS
24 INCLUDED THEREIN.

25 MS. GRUENWALD: I UNDERSTAND, YOUR HONOR. I JUST
26 WANTED TO GET THE DATE IN THAT PETITION INTO THE RECORD.

(WHEREUPON EXHIBIT 11 WAS RECEIVED INTO
EVIDENCE.)

BY MS. GRUENWALD: Q IF YOU CAN GO TO EXHIBIT
12, MISS BRADLEY.

DO YOU RECOGNIZE EXHIBIT 12?

A YES.

Q AND WHAT IS IT?

A AN EMAIL FROM JAMIE.

Q TO YOU?

A TO ME, YES.

Q AND YOU PRINTED THIS EMAIL ON YOUR PRINTER.

A YES.

Q FOR THE RECORD IT'S AN EMAIL DATED APRIL
10TH, 2017. IF YOU GO TO THE SECOND PARAGRAPH, ACTUALLY
BACK UP. THE FIRST PARAGRAPH TOWARDS THE END OF THE
PARAGRAPH IT STARTS WITH, "YOU KNOW ME, SANDY. IF I COME
AFTER THE TRUTH AND HAVE TO FIND IT FROM SOMEONE OTHER THAN
YOU I WILL COME AT YOU TWICE AS HARD. PLEASE THINK LONG AND
HARD WHETHER YOU WANT TO ANSWER THE QUESTIONS WITH ME AND
THE BOYS IN A ROOM WITH YOU OR IN A COURTROOM."

WHAT KIND OF REACTION DO YOU HAVE WHEN YOU
READ THAT KIND OF STUFF?

MR. BLANK: OBJECTION. AMBIGUOUS AS TO "KIND OF
STUFF."

THE COURT: WELL, I THINK SHE JUST READ THAT KIND OF
STUFF.

1 MR. BLANK: EXACTLY. I THINK IT'S RELEVANT WHAT HER
2 REACTION WAS TO THAT STATEMENT. I DON'T KNOW WHAT SHE MEANS
3 BY THAT KIND OF STUFF.

4 MS. GRUENWALD: I'LL REPHRASE.

5 THE COURT: CLARIFY. THANK YOU.

6 BY MS. GRUENWALD: Q MISS BRADLEY, WHAT WAS
7 YOUR REACTION WHEN YOU READ THIS EMAIL?

8 A I LOOKED AT IT AS JUST ANOTHER ONE OF HER
9 THREATS TOWARDS ME.

10 Q AND DO THOSE THREATS BOTHER YOU?

11 A YES.

12 Q THE NEXT PARAGRAPH SAYS, "I HAVE ALREADY
13 STARTED GATHERING THE EVIDENCE. EITHER WAY IT WILL TURN OUT
14 BADLY. I JUST WONDER IF YOUR HEALTH CAN WITHSTAND THE
15 STRESS. THAT IS MY CONCERN."

16 DID MISS GALLIAN, OTHER THAN THIS EMAIL, DID
17 SHE EVER MAKE ANY OTHER THREATS BASED ON YOUR HEALTH?

18 MR. BLANK: OBJECTION. MISSTATES THE EVIDENCE.

19 THE COURT: I THINK THREATS BASED ON YOUR HEALTH
20 DOES.

21 MS. GRUENWALD: OKAY.

22 THE COURT: SUSTAINED.

23 BY MS. GRUENWALD: Q HAVE YOU HAD
24 CONVERSATIONS WITH MISS GALLIAN ABOUT YOUR HEALTH?

25 A NOT REALLY.

26 Q OKAY. SO WAS THIS A THREAT YOU RECEIVED FROM

1 HER WITHOUT HAVING ANY OTHER PRIOR CONVERSATIONS ABOUT YOUR
2 HEALTH?

3 MR. BLANK: OBJECTION. AMBIGUOUS. COMPOUND.

4 THE COURT: SUSTAINED.

5 MS. GRUENWALD: I'LL REPHRASE.

6 Q BEFORE THIS EMAIL HAD YOU HAD ANY
7 CONVERSATIONS WITH MISS GALLIAN ABOUT YOUR HEALTH?

8 A ABOUT MY CURRENT HEALTH, NO.

9 Q OKAY. ABOUT PRIOR HEALTH?

10 A I HAVE HAD HEALTH ISSUES IN THE PAST.

11 Q OKAY. AND YOU DISCUSSED THIS WITH HER?

12 A YES.

13 MS. GRUENWALD: I'D LIKE TO ADMIT EXHIBIT 12 INTO
14 EVIDENCE.

15 MR. BLANK: NO OBJECTION, YOUR HONOR.

16 THE COURT: IT WILL BE ADMITTED.

17 (WHEREUPON EXHIBIT 12 WAS RECEIVED INTO
18 EVIDENCE.)

19 BY MS. GRUENWALD: Q MISS BRADLEY, CAN YOU
20 PLEASE TURN TO EXHIBIT 13. DID -- DO YOU KNOW WHO SUZANNE
21 TAGUE IS?

22 A YES, SHE'S MY ATTORNEY FOR THE PROBATE
23 LAWSUIT.

24 Q AND DID YOU ASK MISS TAGUE TO CONTACT MISS
25 GALLIAN'S ATTORNEY AND ASK THAT SHE NOT CONTACT YOU
26 DIRECTLY?

1 A YES.

2 Q OKAY. AND TO YOUR KNOWLEDGE DID MISS TAGUE
3 DO THAT?

4 A YES.

5 MS. GRUENWALD: YOUR HONOR, I'D LIKE TO ADMIT
6 EXHIBIT 13 INTO EVIDENCE SOLELY FOR IT'S OPERATIVE EFFECT,
7 NOT FOR THE TRUTH OF THE MATTER ASSERTED IN -- FOR THE
8 PURPOSE OF SHOWING THAT ON APRIL 29TH MISS TAGUE SENT NOTICE
9 TO MISS GALLIAN'S COUNSEL THAT MISS BRADLEY SHOULD -- THAT
10 MISS GALLIAN SHOULD NOT CONTACT MISS BRADLEY AND
11 COMMUNICATIONS SHOULD ONLY GO THROUGH COUNSEL.

12 MR. BLANK: NO OBJECTION.

13 THE COURT: IT WILL BE ENTERED.

14 (WHEREUPON EXHIBIT 13 WAS RECEIVED INTO
15 EVIDENCE.)

16 BY MS. GRUENWALD: Q DID MISS GALLIAN
17 CONTINUE TO CONTACT YOU DIRECTLY AFTER APRIL 29TH, 2017?

18 A I'M NOT SURE TO BE HONEST WITH YOU.

19 Q OKAY. WELL WE'LL KEEP GOING. EXHIBIT 14.

20 A OH, APPARENTLY.

21 Q OKAY. MISS BRADLEY, DO YOU RECOGNIZE EXHIBIT
22 14?

23 A YES.

24 Q AND WHAT IS IT?

25 A IT'S AN EMAIL THAT I GOT FROM JAMIE AND BACK
26 AND FORTH. I MEAN, AND RESPONSES.

1 Q OKAY. THERE'S THREE EMAILS ON THE PAGE SO
2 LET'S START WITH THE BOTTOM EMAIL MAY 24TH, 2017. THAT
3 LOOKS LIKE THAT'S AN EMAIL TO YOU FROM MISS GALLIAN; IS THAT
4 CORRECT?

5 A YES.

6 Q AND IT SAYS, "YES, I GOT YOUR PHONE MESSAGE
7 TODAY. REALLY? I'M THE CAUSE OF ALL THIS? YOU ARE RIGHT.
8 MY HUSBAND WOULD BE VERY UPSET AT EVERYTHING THAT HAS GONE
9 DOWN BUT NOT AT ME."

10 WHAT ARE YOU WRITING THIS EMAIL IN RESPONSE
11 TO?

12 A A TELEPHONE -- PHONE -- A TELEPHONE MESSAGE
13 ON MY LAND LINE.

14 Q OKAY. AND DID YOU SAVE THAT TELEPHONE
15 MESSAGE?

16 A I THINK SO. I SAVED THE LAST THREE MESSAGES
17 I GOT FROM HER I DID SAVE.

18 Q AND WHAT DID YOU DO WITH THOSE MESSAGES?

19 A I RECORDED THEM AND GAVE THEM TO YOU.

20 Q OKAY. ABOUT HALFWAY DOWN THE EMAIL IT SAYS,
21 "THEN YOU TOOK YOUR SON'S EMAIL ACCOUNT AND FRAUDULENTLY
22 CONTACTED ME." IS THAT REFERRING TO THE INCIDENT WE TALKED
23 ABOUT EARLIER TODAY?

24 A YES.

25 Q OKAY. NOW MOVING UP THE PAGE THERE'S A
26 SECOND EMAIL THAT YOU WROTE TO MISS GALLIAN ON MAY 25TH,

1 2017; IS THAT CORRECT?

2 A YES.

3 Q OKAY, "SAYS GOT YOUR PHONE MESSAGE AGAIN.

4 WEREN'T YOU TOLD TO ONLY COMMUNICATE WITH ME THROUGH

5 ATTORNEYS? MY NEXT STEP WOULD BE TO PUT A RESTRAINING ORDER

6 ON YOU AS YOU'RE HARASSING ME."

7 Q WHAT IS THAT EMAIL IN RESPONSE TO?

8 A A TELEPHONE MESSAGE THAT SHE LEFT ON MY

9 RECORDER.

10 Q IS THAT A SECOND TELEPHONE MESSAGE?

11 A YES.

12 Q AND FINALLY AT THE TOP OF THE PAGE THIS IS AN

13 EMAIL FROM MISS GALLIAN TO YOU DATED MAY 25TH, 2017. IT

14 SAYS, AT THE BOTTOM, "STOP BEING SO IGNORANT. REMEMBER WHAT

15 GOES AROUND ALWAYS COMES BACK AROUND AND YOU'RE DUE." IS

16 THAT AN EMAIL THAT YOU RECEIVED FROM MISS GALLIAN?

17 A YES.

18 Q OKAY.

19 YOUR HONOR, I'D LIKE TO MOVE EXHIBIT 14 INTO

20 EVIDENCE.

21 MR. BLANK: NO OBJECTION.

22 THE COURT: EXHIBIT 14 WILL BE ENTERED.

23 (WHEREUPON EXHIBIT 14 WAS RECEIVED INTO

24 EVIDENCE.)

25 MS. GRUENWALD: YOUR HONOR, AT THIS TIME I WOULD

26 LIKE TO PLAY THE VOICEMAIL RECORDINGS THAT MISS GALLIAN LEFT

1 FOR MRS. BRADLEY. I'VE HAD THEM TRANSCRIBED AS WELL SO THE
2 COURT AND COUNSEL CAN FOLLOW ALONG. THE -- THERE'S THREE
3 VOICEMAILS. THEY'RE ABOUT -- THE TOTAL TIME FOR ALL THREE
4 VOICEMAILS IS ABOUT SIX MINUTES AND EACH OF THE VOICEMAILS
5 IS TRANSCRIBED AS EXHIBITS THREE, FOUR AND FIVE.

6 MR. BLANK: YOUR HONOR, WE'RE PREPARED TO STIPULATE
7 TO ADMISSION OF THREE, FOUR AND FIVE. AND I THINK THAT'S
8 PROBABLY MORE EFFICIENT USE OF OUR TIME IS JUST TO READ THE
9 TRANSCRIPT RATHER THAN LISTEN AND READ ALONG.

10 THE COURT: ANY OBJECTION? JUST ENTER THREE, FOUR,
11 FIVE.

12 MS. GRUENWALD: THAT'S FINE, YOUR HONOR, IF THE
13 COURT WILL ACCEPT THE TRANSCRIPTS.

14 THE COURT: COURT WILL ACCEPT THE TRANSCRIPTS
15 WITHOUT OBJECTION.

16 MR. BLANK: YES.

17 THE COURT: EXHIBITS THREE, FOUR AND FIVE WILL BE
18 ENTERED.

19 (WHEREUPON EXHIBIT 3, 4 AND 5 WERE RECEIVED
20 INTO EVIDENCE.)

21 BY MS. GRUENWALD: Q MISS BRADLEY, CAN YOU
22 PLEASE TURN TO EXHIBIT 5?

23 A OKAY.

24 Q TAKE A MINUTE TO REVIEW IT TO REFRESH YOUR
25 RECOLLECTION AND LET ME KNOW WHEN YOU'RE DONE READING IT?

26 A OKAY.

1 Q NOW, THIS TRANSCRIPT IS REFERENCING -- FIRST
2 OF ALL, DO YOU REMEMBER THIS VOICEMAIL?

3 A YES.

4 Q AND IN IT MISS GALLIAN SAYS, "I JUST WANTED
5 TO LET YOU KNOW THAT I HAVE MY OWN EXECUTIVE COSTCO CARD NOW
6 SO I CAN GET MY OWN 2% BACK?"

7 DO YOU KNOW WHAT SHE'S REFERRING TO THERE.

8 A WHEN I GOT MY RENEWAL FROM MY COSTCO CARD I
9 REALIZED SHE WAS ON IT SO I TOOK HER OFF.

10 Q AND WHAT HAPPENED AFTER YOU TOOK HER OFF?

11 A SHE MUST HAVE -- SHE WENT TO COSTCO, TRIED TO
12 USE THE CARD, THEY SAID IT WAS NO LONGER VALID.

13 Q AND THEN WAS THIS VOICEMAIL LEFT AFTER YOU
14 HAD TAKEN HER OFF YOUR COSTCO CARD?

15 A YES.

16 Q OKAY. DO YOU KNOW IF THIS WAS DONE -- DO YOU
17 KNOW AROUND THE DATE THAT YOU DID THIS?

18 A I DO NOT KNOW THE DATE.

19 Q DO YOU KNOW IF IT WAS?

20 A IT WAS IN MAY SOMETIME.

21 Q MAY OF THIS YEAR?

22 A YES.

23 Q OKAY. SO IT WAS AFTER MISS TAGUE'S APRIL
24 EMAIL ASKING MISS GALLIAN NOT TO CONTACT YOU?

25 A YES. AND IT WAS THE LAST PHONE MESSAGE SHE
26 LEFT ME.

1 Q THAT WAS THE LAST PHONE MESSAGE?

2 A UH-HUH.

3 Q SO THE TWO PHONE MESSAGES THAT ARE EXHIBIT 4
4 AND 5, THOSE WERE BEFORE?

5 A YES.

6 Q AND DO YOU KNOW IF THE PHONE MESSAGE THAT
7 WERE IN 4 AND 5 WERE IN THE MAY 2017 TIMEFRAME?

8 A YES.

9 Q MISS BRADLEY, IF YOU COULD PLEASE TURN TO
10 EXHIBIT 15?

11 A 15?

12 Q YES. AND DOES THAT DOCUMENT LOOK FAMILIAR TO
13 YOU?

14 A YES.

15 Q WHAT IS IT?

16 A IT'S AN EMAIL THAT I SENT TO JAMIE AND SHE
17 RESPONDED.

18 Q OKAY. THE EMAIL DATED MAY 26TH, 2017, THAT'S
19 FROM JAMIE TO YOU; CORRECT?

20 A YES, THE BOTTOM ONE IS FROM JAMIE TO ME.

21 Q OKAY. SAYS, "STOP BEING SO IRRATIONAL. YOU
22 NEED MY HELP WITH THE HOA. AND, YES, YOUR HEALTH IS BECOME
23 TAXED FROM YOUR OWN STRESS AS YOU SELF REPORTED TO ME. STOP
24 KIDDING YOURSELF AND FIX THE PROBLEM."

25 DO YOU KNOW WHAT SHE'S REFERRING TO WITH
26 NEEDING HER HEALTH FOR THE HOA?

1 A NO.

2 Q AT THIS TIME HAD THE LAWSUIT BEEN INITIATED?

3 A YES.

4 Q AND DO YOU HAVE REPRESENTATION IN THAT
5 LAWSUIT?

6 A YES.

7 Q DID MISS GALLIAN EVER ASK YOU TO HELP HER
8 OBTAIN REPRESENTATION IN THAT LAWSUIT?

9 A NO.

10 MR. BLANK: SORRY. I DIDN'T HEAR THE ANSWER.

11 THE WITNESS: I'M SORRY.

12 BY MS. GRUENWALD: Q DID MISS GALLIAN EVER
13 ASK YOU TO HELP HER OBTAIN REPRESENTATION IN THE LAWSUIT?

14 A YOU MEAN THE HOA LAWSUIT?

15 Q YES.

16 A NO.

17 Q OKAY. I'D LIKE YOU TO FLIP BACK TO EXHIBIT 1
18 WHICH IS THE PETITION THAT YOU FILED, THE ELDER ABUSE
19 PETITION IN THIS ACTION. IF YOU GO TO PAGE 5 OF THE FORM IT
20 HAS ITEMS NUMBER 11 AND 12 ON IT.

21 Q DO YOU SEE THAT?

22 A YES.

23 Q ON NUMBER 12, ONE OF THE ORDERS YOU ASKED THE
24 COURT TO GRANT IS A STAY AWAY ORDER FROM 76757 CHRYSANTHEMUM
25 WAY PALM DESERT, CA 92211. WHAT IS THAT PROPERTY?

26 A IT'S A CONDOMINIUM I OWN IN PALM DESERT.

1 Q DO YOU GO THERE SOMETIMES?

2 A YES, IT'S MY VACATION HOME.

3 Q MISS BRADLEY, CAN YOU GENERALLY SUMMARIZE
4 WHAT REACTION YOU HAD TO THE VARIOUS EMAILS AND VOICEMAILS
5 THAT WE'VE DISCUSSED HERE THIS MORNING.

6 MR. BLANK: OBJECTION. CALLS FOR NARRATIVE.

7 THE COURT: WELL, IN THE INTEREST OF TIME WE'LL HAVE
8 A BIT OF A NARRATIVE. OVERRULED.

9 GO AHEAD, MA'AM.

10 THE WITNESS: WELL, I FIND THE WHOLE THING
11 UPSETTING. THIS IS -- THE PROBATE LAWSUIT IS 17 YEARS AFTER
12 MY HUSBAND'S DEATH. SO I FIND THAT KIND OF ODD IN THAT IT'S
13 SO LONG AFTER HE DIED. SHE'S MADE ALLEGATIONS AGAINST ME
14 LIKE SHREDDING A WILL THAT DID NOT EXIST. SO IT WOULD BE
15 IMPOSSIBLE FOR ME TO SHRED. AND I THINK SOME OF THE THINGS
16 THAT SHE HAS ALLEGED TOWARDS ME ARE JUST ONE MORE LET'S POKE
17 THE BEAR AND SEE WHAT I CAN GET.

18 BY MS. GRUENWALD: Q DOES SHE KNOW HOW TO PRESS
19 YOUR BUTTONS?

20 A YES, ABSOLUTELY.

21 MS. GRUENWALD: NO FURTHER QUESTIONS, YOUR HONOR. I
22 RESERVE REBUTTAL TESTIMONY IF NEEDED.

23 THE COURT: CERTAINLY. BUT I WILL NOTE WE'VE BEEN
24 AT THIS ABOUT AN HOUR NOW. WE'VE JUST GOTTEN THROUGH DIRECT
25 ON YOUR MAIN WITNESS AND YOU ALL GAVE ME AN ESTIMATE OF TWO
26 HOURS. DOESN'T SEEM LIKE TO ME THIS IS GOING TO BE TWO

1 HOURS. I CAN'T BRING YOU BACK THIS AFTERNOON. IT'S A FULL
2 CALENDAR. START THINKING ABOUT WHEN YOU'RE GOING TO COME
3 BACK. WE'RE NOT GOING TO BE ABLE TO FINISH.

4 MR. BLANK: I'M HOPING WE'LL STILL FINISH THIS
5 MORNING, BUT I WOULD LIKE A BATHROOM BREAK OF FIVE MINUTES.

6 THE COURT: WE'RE GOING TO DO THAT. AND I ALSO NEED
7 TO LET YOU KNOW THAT WE HAVE TO ADJOURN TODAY ABOUT A
8 QUARTER TO 12:00. THE COURT HAS TO GO TO ONE OF ITS SECTION
9 MEETINGS.

10 MR. BLANK: WE'LL DO OUR BEST.

11 THE COURT: ALL RIGHT. TEN MINUTES. LET'S BE BACK
12 AT 10:30.

13 MR. BLANK: THANK YOU, YOUR HONOR.

14 THE COURT: YOU'RE WELCOME.

15 (MORNING RECESS.)

16 THE COURT: PROCEED.

17 MR. BLANK: THANK YOU, YOUR HONOR.

18 **CROSS-EXAMINATION**

19 BY MR. BLANK: Q GOOD MORNING, MISS BRADLEY.

20 A GOOD MORNING.

21 Q I'M CHRIS BLANK AND I REPRESENT THE
22 RESPONDENT JAMIE GALLIAN. I HAVE SOME QUESTIONS TO ASK.
23 LET ME JUST START BY SAYING HOW ARE YOU FEELING TODAY?

24 A FINE.

25 Q NO NERVOUSNESS, NO STRESS, NO ANXIETY ABOUT
26 BEING HERE TODAY?

1 A WELL, YES, I FEEL STRESSED, AND I'M
2 RECOVERING FROM HIP SURGERY. BUT I'M DOING OKAY. IF YOU
3 NOTICE WHEN I POURED WATER MY HANDS WERE SHAKING, SO, YES.

4 Q HAPPENS TO ME TOO.
5 BUT THE RECOVERY FROM THE HIP SURGERY'S GOING
6 WELL?

7 A YES.

8 Q YOU'RE ABLE TO SIT WITHOUT ANY SIGNIFICANT
9 PROBLEMS?

10 MS. GRUENWALD: OBJECTION. IRRELEVANT.

11 THE COURT: I BELIEVE IF THE WITNESS HAS ANY
12 PROBLEMS OR DISCOMFORT SHE'LL LET US KNOW.

13 MR. BLANK: THAT'S ALL I WANTED. THANK YOU, YOUR
14 HONOR.

15 Q HOW DID YOU SLEEP LAST NIGHT?

16 A NOT VERY WELL.

17 Q WHY?

18 A BECAUSE I WAS UPSET WHAT WAS GOING TO HAPPEN
19 TODAY.

20 Q WHEN YOU HAVE SOMETHING LIKE A COURT
21 HEARING -- HAVE YOU BEEN A WITNESS BEFORE?

22 A NO.

23 Q SO THIS IS YOUR FIRST TIME DOING SOMETHING
24 LIKE THIS; CORRECT?

25 A YES.

26 Q SO IT'S A LITTLE NERVE-RACKING; RIGHT?

1 A YES.

2 Q IT'S NERVE-RACKING TO HAVE SOMEBODY FILE A
3 PETITION FOR PROBATE OF YOUR FORMER HUSBAND'S -- YOUR LATE
4 HUSBAND'S ESTATE; CORRECT?

5 A YES.

6 Q IT'S STRESSFUL TO HAVE THE HOA SUE YOU;
7 CORRECT?

8 A YES.

9 Q AND THE HOA DID SUE YOU; RIGHT?

10 A YES.

11 Q AND THEY SUED YOU BECAUSE THEY BELIEVE THAT
12 YOU WERE THE OWNER OF THE PROPERTY AT THE TIME THAT VARIOUS
13 MODIFICATIONS WERE MADE TO THE HOUSE AN ALDERPORT; CORRECT?

14 MS. GRUENWALD: OBJECTION. IRRELEVANT AND LACKS --
15 CALLS FOR SPECULATION.

16 THE COURT: SUSTAINED.

17 BY MR. BLANK: Q DO YOU KNOW WHY THE HOA SUED
18 YOU?

19 MS. GRUENWALD: OBJECTION. LACKS FOUNDATION. CALLS
20 FOR SPECULATION.

21 MR. BLANK: IT'S A YES OR NO.

22 THE COURT: OVERRULED.

23 THE WITNESS: ASK AGAIN PLEASE.

24 BY MR. BLANK: Q YES. DO YOU KNOW WHY THE
25 HOA SUED YOU?

26 A YES.

1 Q WHY?

2 A BECAUSE OF CHANGES THAT JAMIE MADE TO THE
3 CONDO.

4 Q AT A TIME WHEN YOU WERE THE OWNER; CORRECT?

5 A YES. YES. I WAS THE OWNER.

6 Q AND YOU'VE COUNTERSUED JAMIE; CORRECT?

7 A YES.

8 Q FOR WHAT?

9 MS. GRUENWALD: OBJECTION. IRRELEVANT.

10 THE COURT: WHAT'S THE RELEVANCE?

11 MR. BLANK: WELL, I GUESS WHAT I'M TRYING TO SHOW IS
12 THAT THERE IS LITIGATION GOING ON BETWEEN THESE TWO. AND
13 I'M NOT EVEN SURE WHY BUT ONE OF THE EXHIBITS ON THE
14 PETITIONER'S EXHIBIT LIST IS THE -- THE DOCKET IN THE HOA
15 CASE.

16 THE COURT: IT'S NOT BEEN INTRODUCED IN DIRECT
17 TESTIMONY AT ALL.

18 MR. BLANK: OKAY. ALL RIGHT. FAIR ENOUGH.

19 Q YOU KNOW THAT MISS GALLIAN HAS ALSO SUED YOU
20 IN THAT LAWSUIT?

21 MS. GRUENWALD: OBJECTION. CALLS FOR A LEGAL
22 CONCLUSION.

23 MR. BLANK: IT'S A YES OR NO. DO YOU KNOW THAT SHE
24 SUED YOU?

25 THE COURT: AS TO THE OBJECTION OVERRULED.

26 YOU MAY ANSWER THE QUESTION.

1 THE WITNESS: YES.

2 BY MR. BLANK: Q DO YOU FIND THAT STRESSFUL?

3 A YES.

4 Q HAVE YOU LOST SLEEP OVER THAT?

5 A NO.

6 Q HAVE YOU SUFFERED ANY OTHER NERVOUS PROBLEMS
7 AS A RESULT OF BEING SUED?

8 MS. GRUENWALD: OBJECTION. VAGUE AS TO BY WHO.

9 MR. BLANK: BY EITHER JAMIE OR THE HOA.

10 THE COURT: SUSTAINED. AND NOW YOU MAY ASK THE
11 QUESTION. AND PLEASE WAIT UNTIL THE COURT RULES ON THE
12 OBJECTION.

13 MR. BLANK: CAN THE COURT REPORTER PLEASE READ THAT
14 QUESTION BACK?

15 THE COURT: YES.

16 (WHEREUPON THE RECORD WAS READ.)

17 BY MR. BLANK: Q AND I'LL ADD TO THAT SUED IN
18 THE HOA LAWSUIT?

19 A NO OTHER NERVOUS, NO.

20 Q IN YOUR DIRECT TESTIMONY YOU TALKED ABOUT
21 CONVERSATIONS YOU HAD WITH JAMIE ABOUT THE CONDO AND
22 TRANSFERRING THE CONDO TO YOU. DO YOU RECALL THAT
23 TESTIMONY?

24 A YES.

25 Q WERE THOSE CONVERSATIONS IN PERSON?

26 A NO.

1 Q WERE THEY BY A TELEPHONE?

2 A YES.

3 Q WERE THERE ALSO EMAILS THAT WENT BACK AND
4 FORTH BETWEEN THE TWO OF YOU REGARDING THAT?

5 MS. GRUENWALD: OBJECTION. VAGUE. REGARDING WHAT?

6 BY MR. BLANK: Q REGARDING THE CONDO
7 SITUATION?

8 A WHICH CONDO SITUATION?

9 Q DISPUTES WITH THE HOA REGARDING THE CONDO?

10 A YES.

11 Q AND WERE THERE EMAILS THAT WENT BACK AND
12 FORTH BETWEEN YOU CONCERNING THE TRANSFER OF THE CONDO IN
13 THE TITLE UP TO THE CONDO INTO JAMIE'S NAME.

14 MS. GRUENWALD: OBJECTION. VAGUE AS TO TIME.

15 THE COURT: SUSTAINED.

16 MR. BLANK: EVER.

17 Q HAVE YOU EVER?

18 A YES.

19 Q WHAT WAS YOUR MOTIVATION FOR TRANSFERRING THE
20 CONDO FROM YOUR TITLE IN THE NAME OF YOU AND YOUR TRUST TO
21 JAMIE THAT TOOK PLACE IN MARCH OF 2017? WHY DID YOU DO
22 THAT?

23 MS. GRUENWALD: OBJECTION. ASKED AND ANSWERED.

24 THE COURT: SUSTAINED.

25 BY MR. BLANK: Q I THINK I'M ENTITLED TO
26 PROBE A LITTLE BIT. THE VERACITY --

1 THE COURT: IF THE QUESTION'S BEEN ASKED AND
2 ANSWERED IT'S BEEN ASKED AND ANSWERED. SHE PROVIDED AN
3 EXPLANATION.

4 BY MR. BLANK: Q AT THE TIME THAT YOU
5 TRANSFERRED THE CONDO FROM YOUR TRUST TO JAMIE YOU WERE
6 AWARE THAT THE HOA WAS ABOUT TO FILE A LAWSUIT, CORRECT?

7 MS. GRUENWALD: OBJECTION. CALLS FOR SPECULATION.

8 THE COURT: IF YOU KNOW, MA'AM, YOU CAN ANSWER THE
9 QUESTION. IF YOU DON'T KNOW DON'T ANSWER THE QUESTION.

10 THE WITNESS: I WASN'T SURE. THEY THREATENED TO BUT
11 THEY HAD NOT.

12 BY MR. BLANK: Q ALL RIGHT. SO THEY SENT
13 DEMAND LETTERS; CORRECT?

14 A I DON'T KNOW WHAT THAT WORD MEANS.

15 Q LETTERS OUTLINING A DISPUTE THAT THEY WANTED
16 TO HAVE RESOLVED?

17 A YES.

18 Q AND IN THOSE LETTERS THEY SAID IF WE DON'T
19 RESOLVE IT WE'RE GOING TO SUE; CORRECT?

20 A YES.

21 Q AND THOSE LETTERS WERE ADDRESSED TO BOTH YOU
22 AND JAMIE; CORRECT?

23 A YES.

24 Q YOU DIDN'T WANT TO GET INVOLVED IN THE
25 LAWSUIT WITH THE HOA AT THAT TIME; CORRECT?

26 A CORRECT.

1 MS. GRUENWALD: OBJECTION. IRRELEVANT. ASKED AND
2 ANSWERED. 352.

3 THE COURT: OVERRULED ON ALL OF THEM.

4 THE WITNESS: I ANSWERED. I SAID "YES."

5 THE COURT: SHE DID.

6 BY MR. BLANK: Q AND WHEN JAMIE SAID YOU NEED
7 MY HELP WITH THE HOA LAWSUIT, DO YOU BELIEVE THAT SHE WAS
8 ACTUALLY OFFERING HER HELP?

9 A NO.

10 Q WHAT DO YOU THINK SHE WAS DOING?

11 A MANIPULATING ME.

12 Q IN WHAT WAY?

13 A THE WAY SHE ALWAYS DOES. TRULY I CAN'T --
14 SHE -- WHAT DOES THE HOA LAWSUIT HAVE TO DO WITH THIS?

15 THE COURT: MA'AM, I'M SORRY. PLEASE ANSWER THE
16 QUESTION. IF YOU CAN'T YOU DON'T HAVE TO, BUT YOU DON'T ASK
17 QUESTIONS OF YOUR OWN.

18 THE WITNESS: OKAY.

19 BY MR. BLANK: Q DO YOU HAVE THE QUESTION IN
20 MIND OR WOULD YOU LIKE TO HAVE IT REREAD SO YOU HAVE THE
21 QUESTION IN MIND?

22 A YES.

23 THE COURT: REREAD THE QUESTION.

24 (WHEREUPON THE RECORD WAS READ.)

25 MR. BLANK: THAT DIDN'T HELP.

26 THE COURT: MANIPULATING YOU, MA'AM, IN WHAT WAY?

1 THE WITNESS: I JUST FELT THAT SHE WAS MANIPULATING
2 ME AND THAT SHE WOULD -- SHE'D ALREADY TOLD ME THAT SHE WAS
3 THROWING ME UNDER THE BUS, SO THAT SHE DIDN'T DO ANYTHING,
4 IT WAS ALL MY FAULT, SO -- BECAUSE I WAS THE OWNER.

5 BY MR. BLANK: Q OKAY. AS A RESULT OF JAMIE
6 OFFERING HER HELP WITH THE HOA, DID THAT CAUSE YOU TO LOSE
7 ANY SLEEP?

8 A NO.

9 Q DID IT CAUSE YOU ANY OTHER NERVOUS TROUBLE?

10 A NO.

11 Q HOW DID YOU FIRST MEET CHARLES BRADLEY?

12 A I WAS HIS SECRETARY.

13 Q AND AT THE TIME HE WAS MARRIED TO JAMIE'S
14 MOM?

15 A YES.

16 MS. GRUENWALD: OBJECTION. IRRELEVANT.

17 THE COURT: WHAT'S THE RELEVANCE.

18 BY MR. BLANK: Q I'M JUST TRYING TO SHOW A
19 LITTLE BACKGROUND ABOUT HOW THEY HAD A CLOSE FAMILIAL
20 RELATIONSHIP FOR DECADES BEFORE WE'VE HAD THIS PROBLEM. I
21 WANT HER TO GO BACK.

22 THE COURT: THE FACT SHE WAS THE SECRETARY MARRIED
23 TO SOMEBODY ELSE ISN'T RELEVANT. IF YOU WANT TO PICK IT UP
24 FROM THEIR MARRIAGE GO AHEAD.

25 MR. BLANK: I'D LIKE TO PICK IT UP FROM WHEN YOU
26 FIRST MET JAMIE. DO YOU KNOW HOW OLD SHE WAS WHEN YOU FIRST

1 MET HER?

2 A I DO NOT.

3 Q DO YOU HAVE A ROUGH ESTIMATE?

4 MS. GRUENWALD: OBJECTION. IRRELEVANT.

5 THE COURT: SUSTAINED.

6 BY MR. BLANK: Q YOU'VE KNOWN JAMIE SINCE
7 CHILDHOOD; CORRECT?

8 A I HAD SEEN HER A FEW TIMES WHEN SHE WAS YOUNG
9 WHEN SHE CAME TO THE OFFICE.

10 Q AND YOUR HUSBAND CHUCK ALWAYS DESCRIBED HER
11 AS HIS DAUGHTER; CORRECT?

12 MS. GRUENWALD: OBJECTION. CALLS FOR SPECULATION.
13 IRRELEVANT. AND I WOULD -- IN LIGHT OF THE FACT THERE'S A
14 PROBATE LAWSUIT --

15 THE COURT: OH, WE'RE NOT GOING TO GET EVIDENCE ON
16 THE PROBATE LAWSUIT. AND THAT IS IRRELEVANT TO TODAY'S
17 PROCEEDINGS. SUSTAINED.

18 BY MR. BLANK: Q HAVE YOU EVER CALLED JAMIE
19 YOUR DAUGHTER?

20 A YES.

21 Q WAS THAT A FREQUENT OCCURRENCE?

22 MS. GRUENWALD: OBJECTION. IRRELEVANT.

23 THE COURT: OVERRULED.

24 THE WITNESS: ASK AGAIN PLEASE.

25 BY MR. BLANK: Q WAS THAT A FREQUENT
26 OCCURRENCE WHEN YOU DESCRIBED JAMIE AS YOUR DAUGHTER OR

1 CALLED HER YOUR DAUGHTER?

2 A SOMETIMES I CALLED HER MY DAUGHTER; SOMETIMES
3 I REFERRED TO HER AS MY STEP DAUGHTER.

4 Q DO YOU CONSIDER HER A FAMILY MEMBER?

5 A NOT ANYMORE.

6 Q DID YOU EVER?

7 A YES.

8 Q WHEN DID YOU STOP CONSIDERING HER A FAMILY
9 MEMBER?

10 A THIS YEAR.

11 Q AT WHAT TIME?

12 A WHEN SHE STARTED SUING ME FOR THE PROBATE.

13 Q WAS THAT IN FEBRUARY OF 2016.

14 MS. GRUENWALD: OBJECTION. WE'VE ESTABLISHED THE
15 DATE OF THE PROBATE AND I BELIEVE THE COURT TOOK JUDICIAL
16 NOTICE OF IT.

17 THE COURT: YES.

18 BY MR. BLANK: Q THE QUESTION IS WHEN DID SHE
19 START THREATENING HER.

20 MS. GRUENWALD: OBJECTION. ASKED AND ANSWERED.

21 THE COURT: SUSTAINED. CERTAINLY WE CAN GO BACK TO
22 FEBRUARY OF 2016.

23 MR. BLANK: 17 IS WHAT I MEANT.

24 THE COURT: AH.

25 BY MR. BLANK: Q WAS IT FEBRUARY OF 2017?

26 MS. GRUENWALD: SAME OBJECTIONS.

1 THE COURT: SUSTAINED. THAT HAS BEEN ASKED AND
2 ANSWERED. AND I BELIEVE SHE SAID IT STARTED IN NOVEMBER OF
3 2016.

4 BY MR. BLANK: Q IN WRITTEN LEGAL DOCUMENTS
5 HAVE YOU EVER DESCRIBED JAMIE AS A FAMILY MEMBER?

6 MS. GRUENWALD: OBJECTION. VAGUE AS TO TIME.

7 THE COURT: SUSTAINED.

8 MR. BLANK: I ASKED IF SHE HAD EVER DESCRIBED JAMIE
9 AS A FAMILY MEMBER IN LEGAL DOCUMENTS.

10 MS. GRUENWALD: OBJECTION. IRRELEVANT.

11 THE COURT: UNLESS IT'S TIGHTENED UP A BIT IT IS
12 IRRELEVANT.

13 BY MR. BLANK: Q HAVE YOU, WITHIN THE LAST
14 YEAR, DESCRIBED JAMIE AS A FAMILY MEMBER IN ANY LEGAL
15 DOCUMENTS?

16 A I REFER TO HER AS MY STEP DAUGHTER, YES.

17 Q HOW ABOUT AS A FAMILY MEMBER?

18 MS. GRUENWALD: OBJECTION. ASKED AND ANSWERED.

19 MR. BLANK: I DON'T THINK IT WAS ANSWERED.

20 THE COURT: IT WASN'T.

21 THE WITNESS: NO.

22 BY MR. BLANK: Q WOULD YOU PLEASE TURN TO
23 EXHIBIT 7. IS THIS YOUR HANDWRITING ON EXHIBIT 7 ON THE
24 FIRST PAGE?

25 A NO.

26 Q WHOSE HANDWRITING IS IT?

1 A I DON'T KNOW BUT I THINK JAMIE'S.

2 Q PARDON ME?

3 A I THINK JAMIE'S.

4 Q SO YOU THINK JAMIE PREPARED THIS?

5 A YES.

6 Q BUT YOU SIGNED IT; CORRECT?

7 A I SIGNED -- I SIGNED -- I SIGNED THIS PAPER

8 BEFORE JAMIE MADE THE CHANGES AT THE TOP.

9 Q WHAT CHANGES DID JAMIE MAKE?

10 A THE RECORDING REQUESTED BY.

11 Q OKAY. ANY OTHER CHANGES SHE MADE BEFORE YOU
12 SIGNED IT?

13 MS. GRUENWALD: OBJECTION. MISSTATES HER TESTIMONY.

14 THE COURT: SUSTAINED. STATEMENTS WERE MADE AFTER
15 SHE SIGNED IT.

16 MR. BLANK: RIGHT. I'M SORRY.

17 Q ANY OTHER CHANGES MADE AFTER YOU SIGNED IT?

18 MS. GRUENWALD: OBJECTION. CALLS FOR SPECULATION.

19 THE COURT: AS PHRASED SUSTAINED.

20 BY MR. BLANK: Q ARE YOU AWARE OF ANY CHANGES
21 THAT WERE MADE AFTER YOU SIGNED THIS DOCUMENT?

22 A I DID NOT SEE THE FRONT PAGE THAT SAYS FAMILY
23 MEMBER.

24 Q SO YOU DISAVOWED THAT THIS WAS A TRANSFER
25 BETWEEN FAMILY MEMBERS; IS THAT CORRECT?

26 MS. GRUENWALD: OBJECTION. CALLS FOR A LEGAL

1 CONCLUSION.

2 THE COURT: SUSTAINED.

3 BY MR. BLANK: Q DO YOU BELIEVE THAT THIS
4 TRANSFER, BASED ON YOUR OWN LAY PERSON'S KNOWLEDGE, WAS A
5 TRANSFER BETWEEN FAMILY MEMBERS?

6 MS. GRUENWALD: OBJECTION. IRRELEVANT.

7 THE COURT: I'M NOT SURE WHAT THE RELEVANCE IS. YOU
8 CAN ANSWER THE QUESTION, MA'AM.

9 THE WITNESS: THE REASON THAT SHE PUT THE FAMILY
10 MEMBER IS TO AVOID TAXES.

11 THE COURT: MA'AM, THAT'S NOT THE QUESTION.

12 MS. GRUENWALD: IT'S A YES OR NO ANSWER.

13 THE WITNESS: I'M SO CONFUSED. SO I DON'T KNOW THE
14 QUESTION.

15 MS. GRUENWALD: MAY WE HAVE THE QUESTION READ BACK.

16 THE COURT: WE CAN, YES.

17 (WHEREUPON THE RECORD WAS READ.)

18 THE WITNESS: WELL, YES AND NO. SO I CAN'T --

19 BY MR. BLANK: Q YES, IN WHAT WAY?

20 A YES, BECAUSE TO AVOID TAXES IT SAYS FAMILY.

21 AT THE TIME I DID NOT LOOK AT HER AS MY FAMILY MEMBER AND I
22 DID NOT SEE THAT PAGE.

23 Q DID YOU PAY A TRANSFER TAX ON THIS TRANSFER?

24 A NO.

25 MS. GRUENWALD: OBJECTION. IRRELEVANT.

26 THE COURT: OBJECTION, WHICH I THINK IS NOT

1 RELEVANT, SHE'S ANSWERED THE QUESTION. I SEE NO HARM.

2 OVERRULED. PLEASE WAIT UNTIL THE COURT RULES ON OBJECTIONS.

3 MR. BLANK: I DIDN'T ANSWER THE QUESTION. I AGREE.

4 THE COURT: YOU STARTED ASKING ANOTHER QUESTION I'M
5 JUST SAYING PLEASE WAIT UNTIL I RULE ON THE OBJECTIONS.

6 MR. BLANK: NO PROBLEM.

7 MS. GRUENWALD: YOUR HONOR, I GUESS I WOULD ASK THE
8 COURT TO STRIKE IT BECAUSE I DON'T KNOW WHAT THE TAX
9 SITUATION IS BETWEEN THE PARTIES AND THE ASSESSORS OFFICE.
10 AND I WOULD JUST PREFER TO HAVE THE ANSWER STRICKEN.

11 MR. BLANK: YOUR HONOR, THE RELEVANCE.

12 THE COURT: WHAT IS THE RELEVANCE?

13 MR. BLANK: THE RELEVANCE IS WHEN IT SUITS HER SHE
14 CONSIDERS JAMIE TO BE A FAMILY MEMBER; WHEN IT DOESN'T SUIT
15 HER --

16 THE COURT: SHE ALREADY STATED SHE NEVER SAW THE
17 FRONT PAGE. THE OBJECTION IS SUSTAINED AND IT'S STRICKEN.

18 MR. BLANK: OKAY.

19 Q YOU TESTIFIED EARLIER ABOUT MR. COOPERSMITH
20 BEING YOUR TRUST ATTORNEY?

21 A YES.

22 Q HOW DID YOU COME TO KNOW MR. COOPERSMITH?

23 A A FRIEND RECOMMENDED HIM TO ME WHEN IT WAS
24 TIME FOR ME TO DO A TRUST AFTER MY HUSBAND DIED.

25 Q WAS HE ALSO YOUR HUSBAND'S TRUST ATTORNEY
26 PRIOR TO THAT?

1 A NO.

2 MS. GRUENWALD: OBJECTION. IRRELEVANT. AND
3 COUNSEL'S FISHING FOR --

4 THE COURT: WHAT RELEVANCE IS THAT REGARDING THIS
5 RESTRAINING ORDER?

6 MR. BLANK: THERE ARE COMMENTS SHE FOUND UPSETTING
7 HAVING TO DO WITH HER RELATIONSHIP WITH MR. COOPERSMITH AND
8 HIS ROLE IN EITHER THE CREATION OR NON-CREATION OF A WILL
9 FOR CHUCK BRADLEY.

10 THE COURT: I DIDN'T HEAR ANYTHING ABOUT HER
11 STATEMENTS REGARDING MR. COOPERSMITH AT ALL.

12 MR. BLANK: ABOUT JAMIE'S STATEMENT ABOUT --

13 THE COURT: THIS IS NOT A FISHING EXPEDITION,
14 COUNSEL, ON THE PROBATE CASE.

15 MR. BLANK: OKAY. WELL, THERE ARE EMAILS WHERE
16 JAMIE SAYS MR. COOPERSMITH'S GOING TO BE IN TROUBLE.

17 THE COURT: THAT'S CORRECT. AND SHE DID NOT TESTIFY
18 SHE WAS UPSET ABOUT MR. COOPERSMITH BEING OR NOT BEING IN
19 TROUBLE.

20 MR. BLANK: GOT IT. OKAY.

21 Q CAN WE PLEASE TURN TO EXHIBIT 1. ARE YOU
22 WITH ME, MISS BRADLEY?

23 A YES.

24 Q CAN YOU TURN TO PAGE 8 OF THAT PAGE, PLEASE.

25 MS. GRUENWALD: I'M SORRY, COUNSEL, PAGE 8?

26 MR. BLANK: YES, THE ONE WITH THE SIGNATURES ON IT.

1 IT'S A LITTLE FUZZY BUT IT'S PAGE 8.

2 Q OKAY. ARE WE THERE?

3 A YES.

4 Q THAT'S YOUR SIGNATURE?

5 A YES.

6 Q YOU UNDERSTOOD WHEN YOU SIGNED IT YOU WERE
7 SIGNING UNDER PENALTY OF PERJURY THAT EVERYTHING IN THAT
8 APPLICATION WAS TRUE AND CORRECT?

9 A YES.

10 Q AND AS FAR AS YOU BELIEVE, AS YOU SIT HERE
11 TODAY, IT WAS TRUE AND CORRECT WHEN YOU SIGNED IT?

12 A YES.

13 Q IS THERE ANYTHING IN IT AT THIS MOMENT YOU
14 WANT TO CORRECT THAT YOU BELIEVE WAS INCORRECT AT THE TIME
15 YOU SIGNED IT?

16 A YES.

17 Q WHAT WOULD YOU LIKE TO CORRECT?

18 A NO, I MEAN EVERYTHING SEEMS FINE.

19 Q LET'S TURN TO THE THIRD PARAGRAPH ON THE NEXT
20 PAGE ENTITLED ATTACHMENT 10-B-3 DESCRIBE ABUSE. I'D LIKE
21 YOU TO TAKE A LOOK AT THE THIRD PARAGRAPH THAT STARTS,
22 "SANDRA, WHO IS UNRELATED TO JAMIE HAS BEEN VERY GENEROUS
23 WITH JAMIE."

24 DO YOU SEE THAT PARAGRAPH?

25 A YES.

26 Q THE NEXT SENTENCE SAYS, "SHE HAS GIFTED TO

1 JAMIE AND JAMIE'S SONS OVER \$700,000 IN ASSETS." DO YOU
2 UNDERSTAND THAT THE "SHE" THAT'S REFERRED TO IS YOU;
3 CORRECT?

4 A YES.

5 Q SO YOU'RE STATING UNDER PENALTY OF PERJURY
6 THAT YOU HAVE GIFTED TO JAMIE AND JAMIE'S SONS OVER \$700,000
7 IN ASSETS FROM THE KINDNESS OF YOUR HEART; CORRECT?

8 A YES.

9 Q AND --

10 A SOME OF THOSE --

11 Q DID YOU WANT TO --

12 A WELL, THE LIST -- THE LIST I PROVIDED THERE
13 ARE SOME ITEMS THAT HAPPENED BEFORE MY HUSBAND'S DEATH.

14 Q OKAY.

15 A SO THE WHOLE AMOUNT OF \$700,000 INCLUDES
16 THOSE ITEMS.

17 Q OKAY. SO TECHNICALLY THAT STATEMENT WASN'T
18 CORRECT?

19 MS. GRUENWALD: OBJECTION. BADGERING THE WITNESS.

20 THE COURT: SUSTAINED.

21 BY MR. BLANK: Q THE STATEMENT THAT YOU
22 GIFTED \$700,000 IN ASSETS IS BASED ON A SPREADSHEET THAT
23 APPEARS BEHIND THAT PAGE, CORRECT? THIS IS EXHIBIT A.
24 WOULD YOU TURN TO THAT, PLEASE.

25 A YES.

26 Q AND THE VERY TOP ITEM ON THAT LIST OCCURRED

1 IN 1998; CORRECT?

2 A YES.

3 Q THAT WAS FOR \$125,000 DESCRIBED AS A LOAN TO
4 OPEN J AND J SHOES?

5 A YES.

6 Q AND THAT WAS NOT A GIFT THAT WAS MADE BY YOU;
7 CORRECT?

8 A IT WAS MADE BY MY HUSBAND AND I.

9 Q OKAY. AND IT'S?

10 A EVERYTHING BEFORE 2000 WAS FROM MY HUSBAND
11 AND I.

12 Q OKAY. SO THE FIRST THING THAT WAS A GIFT BY
13 YOU TO -- NOT JAMIE BUT TO JAMIE'S SONS IS THE COLLEGE FUND
14 FOR JUSTIN, BRIAN AND STEVEN; CORRECT?

15 A YES.

16 Q SO IT WAS INACCURATE FOR YOU TO SAY THAT YOU
17 HAD GIVEN \$700,000 TO JAMIE OVER THE YEARS; CORRECT?

18 MS. GRUENWALD: OBJECTION. MISSTATES THE TESTIMONY.
19 THE COURT: SUSTAINED.

20 BY MR. BLANK: Q IS IT CORRECT THAT YOU GAVE
21 \$700,000 IN GIFTS TO JAMIE OVER THE YEARS?

22 MS. GRUENWALD: OBJECTION. ASKED AND ANSWERED.

23 THE COURT: SUSTAINED. ALSO MISSTATES. SAYS JAMIE
24 AND HER SONS.

25 BY MR. BLANK: Q AT WHAT POINT DID THE
26 PROPERTY AT ALDERPORT BECOME JAMIE'S PROPERTY?

1 MS. GRUENWALD: OBJECTION. CALLS FOR A LEGAL
2 CONCLUSION.

3 THE COURT: WELL IT APPEARS TO ME ASKED AND
4 ANSWERED.

5 THE WITNESS: YEAH.

6 THE COURT: MA'AM.

7 IT'S BEEN SEVERAL TIMES THAT THIS TRANSACTION
8 DIDN'T SHOW THE DEED, COUNSEL.

9 THE WITNESS: SORRY.

10 MR. BLANK: RIGHT. AND ON THIS LIST WE HAVE A
11 STATEMENT THAT DECEMBER OF 2009 IS WHEN THAT GIFT WAS MADE.
12 SO I'M JUST TRYING TO ESTABLISH WAS THE GIFT MADE.

13 THE COURT: IT DOESN'T SAY THAT, COUNSEL. IT SAYS
14 PURCHASE OF 4476 ALDERPORT.

15 MR. BLANK: AND AT THE TOP IT SAYS GIFTS TO JAMIE
16 GALLIAN. SO I'M WONDERING IF THIS WAS A GIFT MADE IN 2009
17 OR A GIFT MADE IN 2017.

18 THE COURT: SHE'S ALREADY TESTIFIED IT WAS MADE IN
19 2017; MARCH 22ND I BELIEVE.

20 MR. BLANK: AND SO THIS IS INACCURATE IN THAT WAY AS
21 WELL; CORRECT.

22 THE WITNESS: NO, IT'S --

23 MS. GRUENWALD: OBJECTION. MISSTATES THE TESTIMONY.
24 SHE TESTIFIED THAT SHE BOUGHT IT FOR HER TO LIVE IN IT.

25 THE COURT: THAT'S ALSO TRUE.

26 MR. BLANK: OKAY. AND I'M WONDERING WAS IT A GIFT

1 MADE IN DECEMBER OF 2009.

2 MS. GRUENWALD: OBJECTION. CALLS FOR A LEGAL
3 CONCLUSION. ASKED AND ANSWERED.

4 THE COURT: OVERRULED.

5 YOU CAN ANSWER, MA'AM.

6 THE WITNESS: IT WAS PURCHASED IN 2009 FOR HER TO
7 LIVE IN. I ACTUALLY GIFTED IT TO HER IN 2017 WITH A MUCH
8 HIGHER VALUE, BUT THAT WAS -- I WAS ITEMIZING THE THINGS
9 THAT I HAD PURCHASED, PAID FOR, DONE.

10 BY MR. BLANK: Q AT THE TIME YOU PURCHASED
11 IT WAS IT JAMIE'S?

12 A NO.

13 Q DO YOU KNOW WHERE JAMIE CAME UP WITH THE
14 ALLEGATION THAT YOU'VE SHREDDDED CHUCK'S WILL?

15 A I DO NOT.

16 MS. GRUENWALD: OBJECTION. CALLS FOR SPECULATION
17 AND IRRELEVANT.

18 THE COURT: OVERRULED. I DON'T BELIEVE IT'S
19 RELEVANT BUT OVERRULED THE OBJECTION WAS INITIALLY GIVEN.

20 THE WITNESS: I DO NOT.

21 BY MR. BLANK: Q IN THE EMAILS THAT SHE SENT
22 YOU, SHE CLAIMS THAT CHUCK'S BROTHER SAID HE WITNESSED YOU
23 SHREDDING THE WILL; CORRECT?

24 A SHE DOES CLAIM THAT.

25 Q DID THAT BOTHER YOU THAT SHE CLAIMED THAT?

26 MS. GRUENWALD: OBJECTION. IRRELEVANT.

1 THE COURT: WHAT'S THE RELEVANCE?

2 MR. BLANK: SHE'S CLAIMING THAT.

3 THE COURT: WHAT'S THE RELEVANCE TO THIS PROCEEDING?
4 WE ARE NOT DOING THE PROBATE.

5 MR. BLANK: I UNDERSTAND, YOUR HONOR. I'M TRYING TO
6 DIG AT WHETHER OR NOT THE STATEMENTS MADE IN JAMIE'S EMAILS
7 WERE UPSETTING BECAUSE JAMIE MADE THEM OR BECAUSE THEY MIGHT
8 BE TRUE OR WHETHER THERE WAS CORROBORATION FOR THEM. IN
9 OTHER WORDS, IN A LAWSUIT PEOPLE MAKE ALLEGATIONS ALL THE
10 TIME, AND THEY'RE PRIVILEGED TO DO THAT -- CONSTITUTIONALLY
11 PRIVILEGED TO MAKE ALLEGATIONS.

12 THE COURT: PROCEED. PROCEED.

13 BY MR. BLANK: Q DO YOU UNDERSTAND THE
14 QUESTION?

15 A I UNDERSTAND THE QUESTION. DID IT UPSET ME?
16 IT UPSET ME THAT SHE LIED, BUT --

17 Q IT DIDN'T UPSET YOU IN ANY OTHER WAY?

18 A NO.

19 Q OKAY. MISS BRADLEY, HAVE YOU SUFFERED ANY
20 PHYSICAL ABUSE AT THE HANDS OF MISS GALLIAN?

21 A NO.

22 Q HAVE YOU SUFFERED NEGLECT BY MISS GALLIAN?

23 A WHAT NEGLECT?

24 Q NEGLECT. I'M GOING THROUGH THE ELEMENTS OF
25 ELDER ABUSE AND I'M TRYING TO FIGURE OUT WHERE WE ARE AMONG
26 THOSE ELEMENTS. I IMAGINE THAT YOU'D RATHER SHE NEGLECTED

1 YOU MORE; AM I RIGHT?

2 A YES. (LAUGHING).

3 Q YOU'RE NOT SAYING SHE NEGLECTED YOU AND THAT
4 CAUSED YOU TROUBLE?

5 A NO.

6 Q GOT IT. HAS MISS GALLIAN ABANDONED YOU?

7 A NO.

8 Q HAS SHE ISOLATED YOU?

9 A NO.

10 Q HAS SHE EVER ATTEMPTED TO ABDUCT YOU?

11 A NO.

12 Q HAS SHE EVER CAUSED YOU PHYSICAL HARM?

13 A NO.

14 Q HAS SHE EVER CAUSED YOU PHYSICAL PAIN?

15 A NO.

16 Q OKAY. SHE'S NEVER BEEN THE CUSTODIAN FOR
17 YOUR CARE; CORRECT?

18 A NO. THEN I WOULDN'T BE ALIVE.

19 MS. GRUENWALD: ANSWER THE QUESTION, MISS BRADLEY.

20 THE WITNESS: SORRY.

21 BY MR. BLANK: Q SO YOU'RE NOT ACCUSING HER
22 OF DEPRIVING YOU OF CARE AS A CUSTODIAN; CORRECT?

23 A NO.

24 Q YOU'RE NOT ACCUSING HER OF DEPRIVING YOU OF
25 GOODS AND SERVICES THAT ARE NECESSARY FOR YOUR YELL BEING?

26 A NO.

1 Q DO YOU UNDERSTAND WHAT FINANCIAL ABUSE
2 CONSISTS OF UNDER THE PROBATE CODE RELATING TO ELDER ABUSE?

3 MS. GRUENWALD: OBJECTION. IRRELEVANT. CALLS FOR A
4 LEGAL CONCLUSION.

5 THE COURT: SUSTAINED.

6 MR. BLANK: SORRY. WRONG CODE ANYWAY.

7 Q I'LL GO WITH A DIFFERENT DIRECTION.

8 DO YOU FEEL YOU'VE SUFFERED FINANCIAL ABUSE
9 AT THE HANDS OF MISS GALLIAN?

10 MS. GRUENWALD: OBJECTION. CALLS FOR A LEGAL
11 CONCLUSION. SHE DOESN'T HAVE TO.

12 THE COURT: SUSTAINED.

13 BY MR. BLANK: Q BETWEEN MARCH OF 2017 AND
14 MAY OF 2017, YOU WERE ANNOYED BY THE EMAILS AND PHONE CALLS
15 YOU GOT FROM JAMIE; CORRECT?

16 A YES.

17 Q DID YOU EVER SEEK ANY TREATMENT FROM A
18 HEALTHCARE PROFESSIONAL FOR ANY PHYSICAL OR OTHER EFFECTS OF
19 THAT ANNOYANCE?

20 A NO.

21 Q DID YOU KEEP A LOG OF THE NIGHTS THAT YOU
22 LOST SLEEP AS A RESULT OF ANY ANNOYANCE THAT YOU SUFFERED?

23 A DID I KEEP A LOG?

24 Q A LOG, YES. A RECORD?

25 A NO.

26 Q DO YOU HAVE A SENSE OF HOW MANY NIGHTS YOUR

1 SLEEP WAS DISTURBED AS A RESULT OF THE ANNOYANCE YOU FELT
2 FROM THE CORRESPONDENCE YOU WERE HAVING WITH MISS GALLIAN AT
3 THAT TIME?

4 A PROBABLY 20 OR 30.

5 Q OKAY. 20 OR 30 NIGHTS WITH DISTURBED SLEEP?

6 A YES.

7 Q CAN YOU DESCRIBE IN DETAIL ANY OF THOSE
8 INCIDENTS HOW IT DISTURBED YOUR SLEEP? IN OTHER WORDS, DID
9 IT CAUSE YOU TO GET UP SEVERAL TIMES IN THE NIGHT? I KNOW
10 THAT HAPPENED TO ME JUST BECAUSE OF OTHER ISSUES, BUT THAT'S
11 WHAT I'M ASKING.

12 A I WOULD HAVE TROUBLE GOING BACK TO SLEEP WHEN
13 I WOULD WAKE UP FOR THOSE KIND OF ISSUES THAT YOU DESCRIBED;
14 BEING UPSET ABOUT ALL OF THE GOINGS ON WITH -- RELATIVE TO
15 JAMIE.

16 Q OKAY. AND SO WHEN THAT MIGHT OCCUR DID YOU
17 TAKE ANY MEDICATION TO RESOLVE THE PROBLEM?

18 A NO.

19 Q WHAT STRATEGIES DID YOU ADOPT TO DEAL WITH
20 THAT ISSUE?

21 MS. GRUENWALD: OBJECTION. IRRELEVANT.

22 THE COURT: WHAT'S THE RELEVANCE?

23 MR. BLANK: THE STATUTE REQUIRES SEVERE MENTAL
24 DISTURBANCE, AND I'M TRYING TO FIGURE OUT WHETHER THERE WAS
25 ANY SEVERE MENTAL DISTURBANCE, AND IF SO WHAT THE REMEDY
26 WAS.

1 THE COURT: ACTUALLY THE DEFINITION IS PHYSICAL
2 ABUSE, NEGLECT, ABANDONMENT, ISOLATION, ABDUCTION, OR OTHER
3 TREATMENT RESULTING IN PHYSICAL HARM OR PAIN OR MENTAL
4 SUFFERING. I DON'T SEE "SEVERE" ANYWHERE IN THERE.

5 MR. BLANK: SO WE'RE TALKING ABOUT MENTAL SUFFERING.
6 WE ALREADY ESTABLISHED THE OTHERS. ON THE OTHER HAND I
7 THINK THAT WE ARE TALKING ABOUT SOMETHING OTHER THAN JUST
8 ORDINARY ANNOYANCE AND THAT'S WHAT I'M TRYING TO GET AT
9 WHETHER --

10 THE COURT: IT'S NOT SEVERE MENTAL SUFFERING. I'M
11 SIMPLY POINTING OUT YOUR DEFINITION WAS INCORRECT. IT'S
12 MENTAL SUFFERING.

13 MR. BLANK: I UNDERSTAND. THE RELEVANCE THOUGH --
14 THE QUESTION IS WAS THERE ANY STRATEGY TO DEAL WITH WHATEVER
15 MENTAL SUFFERING.

16 THE COURT: WHY DOES SHE HAVE TO HAVE A STRATEGY TO
17 DEAL WITH MENTAL SUFFERING BEING IMPOSED ON HER BY SOMEONE
18 ELSE? WHY IS SHE SUPPOSED TO HAVE A STRATEGY? IT SOUNDS TO
19 ME LIKE IT'S PUTTING THE BURDEN ON HER.

20 MR. BLANK: YOUR HONOR, WHAT WE'RE TRYING TO DO IS
21 TEST WHETHER SHE SUFFERED MENTAL SUFFERING AND IF ONE
22 SUFFERS MENTAL SUFFERING AND SEEKS THE CARE OF A PHYSICIAN
23 THAT CERTAINLY BOLSTERS.

24 THE COURT: THAT WASN'T YOUR QUESTION.

25 MR. BLANK: I UNDERSTAND. MY QUESTION WAS DID SHE
26 TAKE ANY MEDICINE, DID SHE SEEK ATTENTION FROM A MEDICAL

1 PROFESSIONAL. THE ANSWER TO BOTH OF THOSE WERE NO.

2 THE COURT: YES.

3 MR. BLANK: SO I'M WONDERING IF THERE WAS ANYTHING
4 ELSE SHE DID TO COPE WITH THE MENTAL SUFFERING SHE SUFFERED.

5 THE COURT: IF YOU SAID THE MENTAL SUFFERING SHE
6 SUFFERED YOU GOT IT RIGHT THERE.

7 MR. BLANK: ALLEGEDLY SUFFERED.

8 THE COURT: SHE'S NOT REQUIRED TO TELL YOU A DEFENSE
9 TO MENTAL SUFFERING.

10 MR. BLANK: SO YOU'RE SUSTAINING THE OBJECTION AS TO
11 RELEVANCE?

12 THE COURT: I AM.

13 MR. BLANK: OKAY. THANK YOU, YOUR HONOR.

14 THE COURT: COUNSEL, WE NEED TO PROCEED.

15 MR. BLANK: YES, I UNDERSTAND.

16 THE WITNESS: MAY I STAND?

17 THE COURT: YOU MAY STAND IF YOU WISH TO ANSWER
18 QUESTIONS.

19 THE WITNESS: THANK YOU.

20 BY MR. BLANK: Q OKAY. ALL RIGHT. SO MISS
21 BRADLEY, IN YOUR PAPERS, THE LAST COMMUNICATION THAT YOU
22 COMPLAINED OF, TOOK PLACE ON MAY 26TH, CORRECT? IF YOU WANT
23 YOU CAN TAKE A LOOK AT EXHIBIT 15. THAT'S THE LAST EMAIL
24 STRING.

25 A OKAY.

26 Q THAT'S MAY 26TH; CORRECT?

1 A YES.

2 Q DOES THAT REFRESH YOUR RECOLLECTION AS TO THE
3 LAST COMMUNICATION WITH JAMIE ABOUT WHICH SHE COMPLAINED?

4 A YES.

5 Q HAVE YOU HAD ANY COMMUNICATIONS WITH JAMIE
6 SINCE MAY 26TH - DIRECTLY WITH JAMIE BY EMAIL?

7 A I'M NOT SURE.

8 Q ARE YOU COMPLAINING ABOUT ANY EMAIL EXCHANGES
9 THAT YOU HAVE WITH JAMIE AFTER MAY 26TH?

10 MS. GRUENWALD: OBJECTION. ASKED AND ANSWERED. SHE
11 JUST SAID SHE WASN'T SURE IF THERE WERE ANY.

12 THE COURT: SUSTAINED. IF SHE CAN'T REMEMBER IF
13 THERE WERE ANY SHE CERTAINLY CAN'T REMEMBER IF SHE'S
14 COMPLAINING ABOUT THEM.

15 BY MR. BLANK: Q OKAY. HAVE YOU HAD ANY
16 TELEPHONE CONVERSATIONS WITH JAMIE DIRECTLY SINCE MAY 26TH?

17 A NO.

18 Q HAVE YOU HAD ANY FACE-TO-FACE COMMUNICATIONS
19 WITH JAMIE AFTER MAY 26TH?

20 A NO.

21 Q ARE YOU AWARE OF WHEN A TEMPORARY RESTRAINING
22 ORDER WAS FIRST IMPOSED ON JAMIE?

23 A IF IT WILL HELP I'LL REPRESENT THAT IT WAS
24 JUNE 9TH?

25 A OKAY.

26 Q HAS JAMIE EVER VIOLATED THE TEMPORARY

1 RESTRAINING ORDER?

2 A NO.

3 Q ARE YOU AWARE THAT THE TEMPORARY RESTRAINING
4 ORDER WAS LIFTED ON JUNE 29TH?

5 A YES.

6 Q HAS JAMIE DONE ANYTHING THAT WOULD HAVE BEEN
7 A VIOLATION OF THE TEMPORARY RESTRAINING ORDER IF IT
8 CONTINUED IN EFFECT PAST JUNE 29TH?

9 A NO.

10 Q EARLIER THIS MORNING YOU TESTIFIED ABOUT AN
11 EXCHANGE YOU HAD WITH JAMIE SHORTLY AFTER CHUCK DIED?

12 A YES.

13 Q AND YOU AND CHUCK WERE IN AN AUTO ACCIDENT IN
14 WHAT STATE?

15 A MONTANA.

16 Q MONTANA. AND WERE YOU STILL IN MONTANA WHEN
17 YOU HAD THAT COMMUNICATION WITH JAMIE?

18 A NO, I WAS AT HOME.

19 Q SO YOU'D COME BACK TO ORANGE COUNTY AT THAT
20 POINT?

21 A YES.

22 Q AND CHUCK'S BODY HAD ALREADY BEEN BROUGHT
23 BACK AT THAT TIME?

24 A HIS ASHES.

25 Q HIS ASHES. AND DID YOU GO WITH JAMIE TO PICK
26 UP HIS ASHES?

1 A NO.

2 Q JAMIE WENT TO PICK UP THE ASHES?

3 A NO.

4 Q WHO WENT TO PICK UP THE ASHES.

5 MS. GRUENWALD: OBJECTION. IRRELEVANT.

6 THE COURT: WHAT'S THE RELEVANCE OF THIS.

7 MR. BLANK: JUST GIVING A LITTLE BACKGROUND.

8 THE COURT: COUNSEL, I UNDERSTAND WHAT YOU'RE SAYING
9 BUT WE DON'T HAVE TIME FOR A LITTLE BACKGROUND. OVERRULED.
10 I MEAN SUSTAINED. SORRY.

11 BY MR. BLANK: Q DURING THE EXCHANGE, IF I
12 UNDERSTOOD YOU CORRECTLY, JAMIE WAS ASKING YOU ABOUT
13 PROBATING CHUCK'S WILL; CORRECT?

14 A NO.

15 Q SO TELL ME. I'M SORRY. JUST REFRESH ME WHAT
16 WAS --

17 A THERE WAS NO WILL, AND SHE -- IT WAS A
18 TELEPHONE CONVERSATION AND SHE WANTED 25% OF MY ESTATE, AND
19 SHE WAS GOING TO SEND A LAWYER TO ME FOR THAT. AND I SAID
20 IF YOU SEND A LAWYER YOU'LL NEVER SEE ME, YOUR CHILDREN WILL
21 NEVER SEE ME, AND YOU WILL NEVER GET ANOTHER DIME.

22 Q AND WHAT WERE YOU INTENDING TO BE THE EFFECT
23 OF THAT THREAT TO JAMIE?

24 A SHE WAS THREATENING ME.

25 Q SO YOU THREATENED HER BACK; CORRECT?

26 A YES, BECAUSE I DIDN'T WANT TO -- AT THAT

1 POINT IN TIME I DID NOT WANT TO BE PRESSURED INTO GIVING HER
2 MONEY.

3 Q OKAY. SO YOU THREATENED HER; RIGHT?

4 A OKAY. I THREATENED TO NEVER SEE HER OR HER
5 CHILDREN.

6 Q RIGHT?

7 A OKAY.

8 Q HER CHILDREN WHO YOU CONSIDERED TO BE YOUR
9 GRANDSONS; CORRECT?

10 A YES.

11 Q OKAY. AND WHAT DID YOU INTEND THE EFFECT OF
12 THAT THREAT TO BE?

13 A FOR HER TO NOT SEND AN ATTORNEY TO ME.

14 Q AND DID IT WORK?

15 A IT DID.

16 Q 17 YEARS; RIGHT?

17 A WELL, SHE ASKED FOR MONEY IN THE MEANTIME AND
18 I GAVE HER MONEY IN THE MEANTIME.

19 Q DID YOU GIVE IT TO HER BECAUSE SHE WAS
20 THREATENING YOU?

21 A NO.

22 Q YOU GAVE IT TO HER BECAUSE YOU FELT IT WAS AN
23 APPROPRIATE THING TO DO?

24 A I -- YES.

25 Q SO 17 YEARS WENT BY WITHOUT FURTHER THREATS
26 TO SEND AN ATTORNEY AFTER YOU; CORRECT?

1 A YES.

2 Q AND THAT CHANGED THIS YEAR?

3 A YES.

4 Q DO YOU KNOW WHY?

5 A BECAUSE I TOLD HER THAT, "HERE'S THE CONDO.
6 I NEVER WANT TO SEE YOU AGAIN, AND THIS IS YOUR
7 INHERITANCE."

8 Q OKAY. SO THE CONDO THAT YOU PURCHASED IN
9 2009; CORRECT?

10 A THAT I GAVE HER IN 2017.

11 Q OKAY. YOU PURCHASED IN 2009 AND YOU GAVE IT
12 TO HER IN 2017 WANTING TO WASH YOUR HANDS OF HER FOREVER?

13 A YES.

14 Q AND YOU TOLD HER SO?

15 A YES.

16 Q HOW DID SHE REACT?

17 A BY THREATENING PROBATE, WHICH SHE DID, BY
18 THREATENING MY TRUST ATTORNEY, WHICH SHE FELT WAS CHUCK'S
19 ATTORNEY AND HE WASN'T.

20 Q SO YOU BASICALLY SAID TO THE EXTENT WE HAVE A
21 FAMILIAL RELATIONSHIP I'M DISOWNING YOU, HERE'S THE CONDO,
22 I'M DONE; CORRECT?

23 A YES.

24 Q AND IT ANGERED HER?

25 A PROBABLY.

26 Q DID YOU EXPECT THAT IT WOULDN'T?

1 A I HAD NO EXPECTATIONS.

2 Q OKAY. AFTER YOUR ATTORNEY MISS TAGUE TOLD
3 JAMIE'S ATTORNEY MR. LEGATE THAT SHE DIDN'T WANT JAMIE TO
4 CONTACT YOU DIRECTLY, RIGHT? AFTER THAT OCCURRED JAMIE
5 CONTACTED YOU; CORRECT?

6 A YES.

7 Q AND YOU RESPONDED; CORRECT?

8 A YES. I DID NOT TALK TO HER BUT I RESPONDED
9 IN EMAILS.

10 Q RIGHT. DID YOU EVER MAKE ANY ATTEMPT TO
11 BLOCK HER PHONE SO THAT IT COULDN'T -- SHE COULDN'T LEAVE
12 MESSAGES ON YOUR VOICEMAIL?

13 A I DID ON MY CELL PHONE AND I DID NOT KNOW HOW
14 TO DO IT ON MY LAND LINE.

15 Q DID YOU EVER BLOCK HER EMAILS?

16 A NO.

17 Q EVEN AFTER SHE HAD SENT YOU SOMEWHAT NASTY
18 EMAILS AND HAD BEEN ASKED NOT TO CONTACT YOU YOU STILL
19 RESPONDED; CORRECT?

20 A YES, I THINK.

21 Q OKAY. WELL, WE CAN TAKE ANOTHER LOOK AT
22 EXHIBIT --

23 A WE DON'T NEED TO DO THAT. I'LL SAY YES.

24 Q ALL RIGHT. AND AFTER YOU RESPONDED THEN
25 JAMIE RESPONDED; CORRECT?

26 A YES.

1 Q UNTIL MAY 26TH AND THEN WE WERE DONE;
2 CORRECT?

3 A YES.

4 Q YOU TOLD US EARLIER IN THE PAST YOU HAD A
5 CONVERSATION ABOUT HEALTH ISSUES WITH JAMIE?

6 A YES.

7 Q AND THOSE WERE POSITIVE CONVERSATIONS? IN
8 OTHER WORDS, YOU HAD HEALTH PROBLEMS AND THE CONVERSATIONS
9 WITH HER WERE HELPFUL OR INTENDED TO BE HELPFUL TO YOU IN
10 DEALING WITH YOUR HEALTH ISSUES?

11 A NO.

12 Q WERE THEY THREATS?

13 A NO, BUT I WOULDN'T DESCRIBE THEM AS BEING
14 HELPFUL.

15 Q BENIGN?

16 A OKAY.

17 Q THAT'S A FAIR CHARACTERIZATION?

18 A YES.

19 Q AND YOU INITIATED SOME OF THOSE CONTACTS
20 ABOUT YOUR HEALTH?

21 A TRULY I HAD BREAST CANCER TEN YEARS AGO. I
22 DON'T REMEMBER CONVERSATIONS ABOUT THAT.

23 Q OKAY. BUT YOU DON'T RECALL BEING UPSET ABOUT
24 THEM?

25 MS. GRUENWALD: OBJECTION. ASKED AND ANSWERED.

26 THE COURT: SUSTAINED.

1 BY MR. BLANK: Q HAS JAMIE EVER COME TO YOUR
2 VACATION HOME - IS IT PALM DESERT?

3 A YES.

4 Q WHEN WAS THE LAST TIME JAMIE VISITED THERE?

5 A IT'S BEEN SEVERAL YEARS.

6 Q AND THAT WAS A VISIT AT YOUR INVITATION?

7 A I WASN'T THERE. SHE ASKED TO USE THE CONDO.

8 Q OKAY. WHEN WAS THE LAST TIME SHE VISITED THE
9 CONDO WHEN YOU WERE THERE?

10 A NEVER I DON'T THINK. MAYBE.

11 Q HAS SHE EVER THREATENED YOUR CONDO AND DO
12 HARM TO YOU?

13 A SHE'S NOT THREATENED TO COME TO MY CONDO, NO.
14 NOT TO THE CONDO.

15 Q WHEN YOU CANCELLED JAMIE'S PARTICIPATION IN
16 YOUR COSTCO CARD DID YOU LET HER KNOW YOU WERE DOING THAT?

17 A NO.

18 Q WHY NOT?

19 MS. GRUENWALD: OBJECTION. IRRELEVANT.

20 THE COURT: WHAT'S THE RELEVANCE?

21 MR. BLANK: IT SPURRED ONE OF THE EMAILS -- ONE OF
22 THE ANGRY VOICEMAILS WAS THAT JAMIE SHOWED UP AT COSTCO WITH
23 NO FOREKNOWLEDGE THAT SHE WASN'T ON THE ACCOUNT ANYMORE.

24 THE COURT: OVERRULED.

25 YOU CAN ANSWER THE QUESTION, MA'AM.

26 THE WITNESS: SO ASK -- WHAT'S THE QUESTION AGAIN?

1 BY MR. BLANK: Q WHY DIDN'T YOU TELL HER YOU
2 WERE TAKING HER OFF THE ACCOUNT?

3 A I WASN'T COMMUNICATING WITH HER. MY ATTORNEY
4 TOLD ME NOT TO COMMUNICATE WITH HER.

5 Q GOT YOU. AND YOU DIDN'T COMMUNICATE WITH
6 YOUR ATTORNEY TO TELL HER SO SHE WOULDN'T MAKE AN
7 UNNECESSARY TRIP?

8 A NO. DID NOT.

9 Q ALL RIGHT.

10 I NEED A MOMENT TO CONFER WITH MY CLIENT,
11 PLEASE.

12 THE COURT: A BRIEF MOMENT.

13 (BRIEF PAUSE.)

14 MR. BLANK: JUST A FEW MORE QUESTIONS.

15 Q IN JANUARY OF THIS YEAR WERE YOU LIVING IN
16 YOUR COTO DE CAZA HOUSE OR WERE YOU OUT IN THE DESERT?

17 A I WAS AT BOTH IN JANUARY.

18 Q OKAY. HOW ABOUT FEBRUARY?

19 A AGAIN, BOTH.

20 Q OKAY. AND AS FAR AS YOU RECALL THERE WEREN'T
21 ANY COMMUNICATIONS, THREATS GOING ON IN JANUARY OR FEBRUARY
22 OF THIS YEAR; CORRECT?

23 A IT WAS DECEMBER THE LAST TIME SHE THREATENED
24 ME, YES. SO NOT JANUARY OR FEBRUARY.

25 Q OKAY. AND THEN ON MARCH 2ND YOU GOT THE
26 DEMAND LETTER -- OR THE LETTER FROM THE HOA ATTORNEY;

1 CORRECT?

2 A I GOT LOTS OF LETTERS FROM THE HOA ATTORNEY.

3 Q THE ONE WE'RE TALKING ABOUT WHERE THEY SAID
4 WE HAVE PROBLEMS WITH WHAT'S GOING ON AT THE UNIT OUT ON
5 ALDERPORT, AND IF WE DON'T FIX IT WE'RE GOING TO SUE, RIGHT?
6 YOU RECALL THAT LETTER?

7 A I GOT MORE THAN ONE OF THOSE LETTERS.

8 Q OKAY. WHEN YOU GOT THE LETTER THAT CAME --
9 OR THAT WAS DATED MARCH 2ND, DID YOU CONTACT JAMIE ABOUT
10 WHAT WAS GOING ON OUT THERE?

11 MS. GRUENWALD: OBJECTION. CALLS FOR FACTS NOT IN
12 EVIDENCE. I DON'T THINK WE'VE ESTABLISHED THAT THERE WAS A
13 LETTER ON MARCH 2ND.

14 THE COURT: SUSTAINED.

15 BY MR. BLANK: Q WHEN YOU FIRST FOUND OUT
16 THAT THERE WERE GOING TO BE SOME KIND OF LEGAL DISPUTES WITH
17 THE HOA, DID YOU CONTACT JAMIE IN MARCH OF 2017?

18 A I CAN'T SAY IF IT WAS MARCH, BUT I HAVE -- I
19 WAS IN CONTACT WITH JAMIE OVER THE DISPUTES.

20 Q OKAY. AND WHAT DID YOU SAY TO JAMIE?

21 A I ASKED HER TO TAKE THE ROOF OFF. I ASKED
22 HER TO ALLOW ME TO TAKE THE ROOF OFF AND SHE SAID, "NO. I'M
23 HANDLING IT. LET ME HANDLE IT."

24 Q AND WHEN SHE SAID, "NO. LET ME HANDLE IT"
25 THEN WHAT WAS YOUR RESPONSE?

26 A I LET HER HANDLE IT.

1 Q OKAY. DID YOU ASK HER TO SPECIFICALLY HANDLE
2 IT?

3 A NO.

4 Q OKAY. BUT YOU JUST SAID, "FINE. YOU CAN
5 HANDLE IT?"

6 A RIGHT.

7 Q WHEN YOU GIFTED OR SIGNED EXHIBIT 7 AND
8 TRANSFERRED THE ALDERPORT PROPERTY TO JAMIE, DID YOU DO THAT
9 WITH THE EXPECTATION THAT THAT WAS GOING TO GET YOU OUT OF
10 THE HOA DISPUTE?

11 MS. GRUENWALD: OBJECTION. IRRELEVANT. CALLS FOR A
12 LEGAL CONCLUSION.

13 THE COURT: SUSTAINED.

14 BY MR. BLANK: Q WHEN YOU TRANSFERRED THE
15 PROPERTY TO JAMIE IN THE EXHIBIT 7, DID THAT GET YOU OUT OF
16 THE HOA DISPUTE?

17 A NO.

18 Q DID THAT UPSET YOU?

19 A NOT ANYMORE THAN ANY OF THE REST OF THE
20 THINGS.

21 Q OKAY.

22 MR. BLANK: PASS THE WITNESS.

23 THE COURT: GO AHEAD.

24 MS. GRUENWALD: JUST A FEW QUESTIONS.

25 **REDIRECT EXAMINATION**

26 BY MS. GRUENWALD: Q MISS BRADLEY, YOU KNEW

1 YOU WERE GOING TO SEE MISS GALLIAN HERE TODAY; CORRECT?

2 A YES.

3 Q HOW DID YOU FEEL THE THOUGHT OF SEEING HER
4 TODAY?

5 A UPSET.

6 Q ANY PHYSICAL FEELINGS?

7 A JITTERY STOMACH, YEAH.

8 Q ARE YOU AFRAID OF MISS GALLIAN?

9 A YES.

10 Q HAS SHE EVER THREATENED TO COME TO YOUR HOME?

11 A YES.

12 Q AND WAS THAT THREAT TO DO HARM?

13 A SHE SAID TO HAVE IT OUT. SO I DON'T KNOW
14 WHAT SPECIFICALLY THAT MEANT.

15 Q BUT YOU TOOK THAT AS A THREAT?

16 A YES.

17 MS. GRUENWALD: NO FURTHER QUESTIONS, YOUR HONOR.

18 THE COURT: NO?

19 MR. BLANK: NOTHING FURTHER.

20 THE COURT: ALL RIGHT. THANK YOU, MA'AM. YOU CAN
21 STEP DOWN NOW.

22 THE COURT: MISS GRUENWALD?

23 MS. GRUENWALD: I HAVE NO FURTHER WITNESSES, YOUR
24 HONOR.

25 THE COURT: COUNSEL?

26 MR. BLANK: I MOVE FOR JUDGMENT AT THE END OF THE

PETITIONER'S CASE.

THE COURT: THAT'S DENIED. COURT FEELS IT'S HEARD
SUFFICIENT ESPECIALLY WHEN THE STANDARD OF EVIDENCE IN THESE
MATTERS ARE PREPONDERANCE.

MR. BLANK: UNDERSTOOD. SO ONCE AGAIN I NEED A
MOMENT TO CONFER WITH MY CLIENT TO SEE IF WE'RE GOING TO PUT
HER ON THE STAND.

THE COURT: GO AHEAD.

(BRIEF PAUSE.)

MR. BLANK: YOUR HONOR, I'D LIKE TO CALL JAMIE
GALLIAN TO THE STAND.

THE COURT: HAVE HER SWORN.

THE CLERK: DO YOU SOLEMNLY STATE THAT THE TESTIMONY
YOU'RE ABOUT TO GIVE IN THE CASE NOW PENDING BEFORE THIS
COURT SHALL BE THE TRUTH, THE WHOLE TRUTH, AND NOTHING BUT
THE TRUTH, SO HELP YOU GOD?

THE WITNESS: YES.

THE CLERK: PLEASE STATE YOUR NAME FOR THE RECORD.

THE WITNESS: JAMIE LYNN GALLIAN

JAMIE LYNN GALLIAN,

CALLED AS A WITNESS BY AND ON HER OWN BEHALF, HAVING BEEN
FIRST DULY SWORN, WAS EXAMINED AND TESTIFIED AS FOLLOWS:

DIRECT EXAMINATION

THE COURT: ALL RIGHT, COUNSEL.

1 BY MR. BLANK: Q MISS GALLIAN, LET'S START
2 JUST WITH A LITTLE BIT OF BACKGROUND. ARE YOU EMPLOYED?

3 A YES.

4 Q BY WHOM?

5 A UNITED AIRLINES.

6 Q WHAT DO YOU DO FOR UNITED AIRLINES?

7 A I'M A FLIGHT ATTENDANT.

8 Q HOW LONG HAVE YOU BEEN A FLIGHT ATTENDANT?

9 A START MY 18TH YEAR IN DECEMBER.

10 Q ARE YOU PRESENTLY ON A LEAVE OF ABSENCE?

11 A YES.

12 Q WHY?

13 A BECAUSE I CANNOT WORK WITH A RESTRAINING
14 ORDER ON MY PASSPORT.

15 Q OKAY. AND HOW DO YOU KNOW THIS?

16 A IT'S IN OUR COMPANY POLICY.

17 Q BUT FOR THE -- FORGET THAT. I'D LIKE YOU TO
18 TURN YOUR ATTENTION TO OCTOBER OF 2016?

19 A UH-HUH.

20 Q WHAT WAS HAPPENING IN 2016 BETWEEN YOU AND
21 MS. BRADLEY? OCTOBER OF 2016?

22 A OCTOBER OF 2016 WAS JUST AFTER I HAD
23 SUBMITTED THE -- ADDENDUM FOR THE HOA. I ATTENDED EVERY --
24 EVERY MEETING THAT SHE WAS SUPPOSED TO BE AT. I WENT.
25 AND --

26 Q LET ME BREAK IT DOWN FOR YOU. MAYBE THIS

1 WILL HELP.

2 IN OCTOBER OF 2016 YOU WERE SEEKING
3 PERMISSION FROM THE HOA TO PUT A PATIO COVER ON YOUR PATIO?

4 A IT WAS THE SECOND -- IT WAS THE SECOND
5 ADDENDUM PREPARED AND -- YEAH.

6 THE COURT: MA'AM, WITH EVERYONE ELSE, YOU NEED TO
7 ANSWER THE QUESTION THAT'S ASKED.

8 THE WITNESS: YES, MA'AM.

9 BY MR. BLANK: Q OKAY. ALL RIGHT. THERE WAS
10 A SECOND ADDENDUM HAVING TO DO WITH THE PATIO COVER. WHY
11 WAS THERE A SECOND ADDENDUM?

12 A JUST BECAUSE OF THE BOARD'S KNOWLEDGE NOT
13 BEING KNOWLEDGEABLE AND NOT FAMILIAR WITH --

14 Q WE DON'T NEED THE DETAIL, BUT THE POINT IS
15 THERE WAS A DISPUTE BETWEEN YOU AND THE HOA OVER YOUR PATIO
16 COVER; CORRECT?

17 A YES.

18 Q AND AS THE OCCUPANT OF THE PREMISES YOU
19 ATTENDED THE HOA BOARD?

20 A EVERY SINGLE ONE OF THEM.

21 Q DID SANDY EVER ATTEND ANY OF THOSE MEETINGS?

22 A NO.

23 Q DID SHE AUTHORIZE YOU TO ATTEND AS HER
24 REPRESENTATIVE AT THOSE MEETINGS?

25 A YES.

26 Q DID SHE DO THAT IN WRITING?

1 A YES.

2 Q DID THE HOA EVER DISPUTE YOUR AUTHORITY TO
3 REPRESENT --

4 MS. REPORTER: WAIT. HANG ON. STATE YOUR LAST
5 QUESTION, PLEASE.

6 MR. BLANK: YES.

7 Q DID THE HOA EVER CHALLENGE YOUR AUTHORITY TO
8 REPRESENT SANDY AT THOSE HOA MEETINGS?

9 A NOT UNTIL --

10 MS. GRUENWALD: OBJECTION. IRRELEVANT.

11 THE COURT: WHAT IS THE RELEVANCE?

12 MR. BLANK: WELL, WE'RE BUILDING UP TO EXPLAINING
13 WHY THERE WAS A DISPUTE IN THE FIRST PLACE.

14 THE COURT: ALL RIGHT, COUNSEL. GO AHEAD. WE'LL
15 SEE IF THERE'S ANY RELEVANCE TO IT. I'M NOT SEEING ANY
16 RELEVANCE RIGHT NOW BUT GO AHEAD.

17 MR. BLANK: I UNDERSTAND. WE'LL TRY TO MOVE ALONG
18 QUICKLY.

19 THE WITNESS: IF IT MIGHT HELP THE COURT --

20 THE COURT: NO. YOU WILL ANSWER THE QUESTION ASKED,
21 MA'AM.

22 BY MR. BLANK: Q SO IN OCTOBER, THE
23 COMMUNICATIONS BETWEEN YOU AND SANDY WERE CORDIAL; CORRECT?

24 A UH-HUH.

25 Q IS THAT A "YES?"

26 A YES. YES, SIR.

1 Q AND IN NOVEMBER, SAME THING; CORRECT?

2 A YES.

3 Q HOW ABOUT JANUARY OF 2017?

4 A JANUARY SHE WASN'T SPEAKING TO ME, BUT WE
5 WERE ONLY COMMUNICATING BY EMAIL OR IF WE DID SPEAK ON THE
6 PHONE IT WAS ONLY REGARDING HOA BUSINESS.

7 Q OKAY. AND HOW ABOUT FEBRUARY OF 2017?

8 A SHE WAS GONE MOST OF THE TIME.

9 Q WERE YOU COMMUNICATING WITH HER?

10 A I WAS TRYING TO.

11 Q WERE THE COMMUNICATIONS CORDIAL?

12 A YES.

13 Q WHAT CHANGED IN MARCH?

14 A WHEN I GOT THE LETTER ADDRESSED TO ME AND
15 SANDY ON MARCH 2ND THE ADDRESS HAS ME ON THE RIGHT SIDE OF
16 THE FORM AND IT HAS MY NAME, AND ON THE LEFT SIDE OF THE
17 FORM IT SAID SANDRA BRADLEY TRUST DATED 10/18/01.

18 Q OKAY. AND WHAT EFFECT DID SEEING THOSE
19 ADDRESSES HAVE ON YOU?

20 A I BELIEVED THAT THE TRUST THAT SHE'S BEEN
21 TALKING ABOUT ALL THESE YEARS WAS MY FATHER'S TRUST.

22 Q OKAY.

23 A NOT ANYTHING THAT WAS --

24 THE COURT: AGAIN, WE'RE NOT DOING THE PROBATE COURT
25 CASE HERE.

26 MR. BLANK: RIGHT. I UNDERSTAND.

1 THE COURT: PLEASE KEEP IN TERMS OF ABUSE. I DON'T
2 WANT TO HEAR ABOUT THIS ALLEGED PROBATE CASE.

3 THE WITNESS: OKAY. SO MARCH 2ND, TO ANSWER YOUR
4 QUESTION, I RECEIVED THE LETTER. AND SANDY WAS IN THE
5 DESERT HOME. SHE HAS TEAM GOLF FOR THE FIRST QUARTER OF THE
6 YEAR AND I HAD CONVERSATIONS WITH HER. SHE'S -- DO WHAT YOU
7 CAN, AND I SAID I'M TRYING AS HARD AS I CAN TO GET THIS HOA
8 TO BE REMOVED, AND I SPENT HOURS AND HOURS AND HOURS
9 THINKING ABOUT WHAT I SHOULD DO. AND SO I STARTED SITTING
10 DOWN AND READING THE CC&R'S. AND IT HIT ME RIGHT AWAY.
11 CONDOMINIUM PLANS. SO I WENT TO THE RECORDER'S OFFICE ON
12 MARCH 6, FOUR DAYS AFTER THIS LATER CAME, AND I HAD FELT
13 THAT I FOUND THE ANSWER TO OUR PROBLEM BECAUSE THE PATIO WE
14 OWN FOR THIS CONDOMINIUM PLAN. AND WHILE I WAS WAITING FOR
15 THE COPIES IS WHEN I STARTED SEARCHING EVERYBODY'S NAME AND
16 FOUND OUT THAT THERE WASN'T A TRUST FOR MY FATHER AND THERE
17 WAS NO WILL FILED.

18 Q OKAY. SO WE'RE NOT GOING TO BE GOING --

19 A RIGHT. EXACTLY.

20 Q BUT THIS IS WHAT STARTED YOU ON YOUR -- ON
21 YOUR --

22 A INVESTIGATION.

23 THE COURT: MA'AM, PLEASE DON'T MAKE COMMENTS WHEN
24 COUNSEL IS SPEAKING. WE NEED A CLEAR RECORD. THANK YOU.

25 BY MR. BLANK: Q THIS IS WHAT STARTED YOU ON
26 THE INVESTIGATION AND THE PATH TOWARD PETITIONING FOR THE

1 ADMINISTRATION OF CHUCK'S ESTATE; CORRECT?

2 A YES.

3 Q AND WHEN YOU NOTIFIED SANDY OF THAT IT UPSET
4 HER; CORRECT?

5 A YES.

6 Q AND WHAT WAS HER RESPONSE?

7 A MY BOYS AND I ALL OFFERED TO WORK WITH HER,
8 AND THAT'S WHAT WE TRIED TO DO IS JUST -- LET'S SIT DOWN AND
9 TALK ABOUT IT. LET'S SEE WHAT HAPPENED, WHAT WE CAN WORK
10 OUT, WHO MISUNDERSTOOD WHAT. AND SHE JUST CLOSED UP.

11 Q ALL RIGHT. DO YOU SINCERELY BELIEVE THAT
12 THERE ARE ASSETS THAT YOU SHOULD HAVE INHERITED?

13 A YES.

14 THE COURT: THIS IS NOT THE PROBATE CASE.

15 MR. BLANK: I UNDERSTAND.

16 THE COURT: THEN PLEASE MOVE ON. YOU'RE ASKING
17 ABOUT THE PROBATE CASE. THIS IS AN ELDER ABUSE HEARING.

18 MR. BLANK: I'M TRYING TO GET AT THE SINCERITY OF
19 HER BELIEFS AND THE REASONS --

20 THE COURT: I DON'T CARE ABOUT THE SINCERITY OF HER
21 BELIEF IF SHE WAS ABUSIVE EMOTIONAL OR MENTALLY.

22 BY MR. BLANK: Q HAVE YOU EVER THREATENED
23 MISS BRADLEY WITH PHYSICAL HARM?

24 A NO.

25 Q HAVE YOU EVER INTENDED TO HARASS HER?

26 A NO.

1 Q HAVE YOU MADE STATEMENTS CONCERNING YOUR
2 BELIEF ABOUT YOUR LEGAL RIGHTS THAT SHE HAS FOUND UPSETTING?

3 A YES.

4 Q DID YOU MAKE THOSE STATEMENTS WITH THE INTENT
5 TO ANNOY HER?

6 A NO.

7 Q DO YOU PRESENTLY INTEND ANY HARM TO MS.
8 BRADLEY?

9 A ABSOLUTELY NOT.

10 Q DO YOU INTEND TO PURSUE YOUR LEGAL RIGHTS AS
11 YOU UNDERSTAND THEM?

12 A YES.

13 Q DO YOU INTEND TO GO BEYOND PURSUING YOUR
14 LEGAL RIGHTS AS YOU UNDERSTAND THEM?

15 A NO.

16 Q I HESITATE TO ASK THIS QUESTION. I'M GOING
17 TO DO IT ANYWAY. IS THERE ANYTHING ELSE YOU THINK THE COURT
18 NEEDS TO KNOW ABOUT THIS HARASSMENT TRO LAWSUIT?

19 MS. GRUENWALD: OBJECTION. NARRATIVE.

20 THE COURT: SUSTAINED.

21 MR. BLANK: PASS THE WITNESS.

22 THE COURT: MISS GRUENWALD.

23 MS. GRUENWALD: THANK YOU, YOUR HONOR. JUST
24 BRIEFLY.

25 **CROSS-EXAMINATION**

26 BY MS. GRUENWALD: Q MISS GALLIAN, YOU

1 TESTIFIED THAT YOU ARE ON A LEAVE OF ABSENCE BECAUSE OF MISS
2 BRADLEY'S RESTRAINING ORDER?

3 A UH-HUH. I HAVE THE PAPERWORK RIGHT FROM
4 THERE.

5 Q IS THAT A "YES?"

6 A YES, IT IS.

7 Q AND HAVE YOU EVER BEEN PLACED ON A LEAVE OF
8 ABSENCE BEFORE FOR OTHER RESTRAINING ORDERS THAT WERE ISSUED
9 AGAINST YOU?

10 A NO.

11 Q HAVE YOU EVER HAD ANY OTHER RESTRAINING
12 ORDERS ISSUED AGAINST YOU?

13 A NO.

14 Q DID YOUR EX-HUSBAND GEORGE GALLIAN ISSUE A
15 RESTRAINING ORDER AGAINST YOU?

16 A NO.

17 MS. GRUENWALD: NO FURTHER QUESTIONS, YOUR HONOR. I
18 WOULD LIKE TO RECALL MY CLIENT AS A REBUTTAL WITNESS.

19 THE COURT: DO YOU HAVE ANY FURTHER QUESTIONS?

20 MR. BLANK: NO.

21 THE COURT: YOU MAY STEP DOWN, MA'AM.

22 ALL RIGHT. MA'AM.

23 THE COURT: ACTUALLY I HAVE ONE MORE QUESTION FOR
24 YOUR CLIENT.

25 MR. BLANK: I'M SORRY, YES.

26 THE COURT: I UNDERSTAND THESE VOICEMAIL

1 TRANSCRIPTIONS WERE ALL FROM -- WAS IT MAY?

2 THE WITNESS: UH-HUH.

3 THE COURT: MAY OF THIS YEAR.

4 SO, MA'AM WHEN YOU'RE SAYING IN VOICEMAIL
5 TRANSCRIPTION NUMBER 1 ABOUT -- ALLEGEDLY ABOUT YOUR FATHER.
6 "I'M NOT SAYING YOU DON'T DESERVE THEM AS THE RIGHT. YOU
7 ABSOLUTELY DO." WHAT ARE YOU TALKING ABOUT?

8 MR. BLANK: YOU WANT TO READ IT? THIS IS EXHIBIT 3.

9 THE WITNESS: WHAT'S THE DATE, MA'AM?

10 MR. BLANK: WE DON'T HAVE A FIRM DATE ON EXHIBIT 3.

11 THE COURT: NO, SHE SAID THEY WERE LEFT IN MAY.

12 MR. BLANK: RIGHT. AND WHICH PARAGRAPH ARE WE -- DO
13 YOU WANT?

14 THE COURT: THE LAST PARAGRAPH ON THE PAGE.

15 THE WITNESS: I HAVE TO READ IT IN MY HEAD.

16 OKAY. SO THE DATE OF THIS IS MAY 24TH
17 BECAUSE THAT'S THE DATE WE WERE SERVED. YOU KNOW, IT'S
18 ALWAYS AMAZING WHAT GOES AROUND COMES AROUND. AND I DON'T
19 MEAN --

20 THE COURT: MA'AM, DON'T READ THAT OUT LOUD.

21 THE WITNESS: I'M TRYING TO GET IT IN MY HEAD.

22 THE COURT: READ IT SILENTLY.

23 THE WITNESS: OKAY. WHAT DOES SHE WANT TO ASK ME
24 ABOUT?

25 MR. BLANK: THE QUESTION HAS TO DO WITH THIS
26 PARAGRAPH BUT GO AHEAD AND READ THIS ONE TO YOURSELF.

1 THE WITNESS: WHAT I WAS BASICALLY SAYING IS
2 THAT --

3 THE COURT: WHAT WERE YOU SAYING?

4 THE WITNESS: I HAVE LIKE GUM MOUTH RIGHT NOW.

5 SO WHAT I WAS SAYING HERE IS IF YOU LOOK AT
6 THE PARAGRAPH RIGHT BEFORE IT I WAS BASICALLY SAYING THAT,
7 I'M NOT SAYING THAT YOU DON'T DESERVE THEM AS THE RIGHT, YOU
8 ABSOLUTELY DO. I DON'T -- I THINK THAT WAS A MISS -- I USED
9 TO BE A TRANSCRIPTIONIST. THAT'S A MISQUOTE. YOU
10 ABSOLUTELY DO BUT I ALSO KNOW MY DAD IS A VERY GENEROUS
11 PERSON AND I KNOW THAT THIS IS WHAT HE WANTED NOT WHAT --

12 THE COURT: I DIDN'T ASK YOU TO READ IT. I ASKED
13 YOU WHAT YOU MEANT.

14 THE WITNESS: BASICALLY THAT THE PARAGRAPH RIGHT
15 BEFORE IS TALKING ABOUT MY DAD'S SISTER.

16 THE COURT: YES.

17 THE WITNESS: YES. OKAY. AND AT THIS POINT I HAD
18 LEARNED THAT MY DAD'S SISTER WAS CUTOFF FROM THE FAMILY AND
19 SO I FLEW TO DENVER AND TO MEET WITH HER AND APOLOGIZE. AND
20 I'M SAYING -- I'M JUST SAYING THAT MY DAD WAS A GENEROUS
21 PERSON AND THAT HE WOULD ABSOLUTELY SHARE HIS HARD WORK OF
22 42 YEARS.

23 THE COURT: AND THEN YOU SAID, "I'M NOT SAYING YOU
24 DON'T DESERVE THEM AS THE RIGHT. YOU ABSOLUTELY DO." WHAT
25 DID YOU MEAN.

26 THE WITNESS: THAT SHE DESERVES THE THINGS THAT

1 SHE'S TAKEN, THAT SHE HAS.

2 THE COURT: SO THE ASSETS ARE HERS. ALL RIGHT.

3 THANK YOU, MA'AM.

4 THE WITNESS: YEAH, THAT'S ALL I WAS SAYING.

5 THE COURT: THAT'S WHAT I THOUGHT.

6 MISS GRUENWALD.

7 SANDRA BRADLEY,

8 RECALLED AS A WITNESS ON HER OWN BEHALF, AND HAVING BEEN
9 PREVIOUSLY DULY SWORN, WAS FURTHER EXAMINED AND TESTIFIED AS
10 FOLLOWS:

11

12 **DIRECT EXAMINATION**

13 BY MS. GRUENWALD: Q MISS BRADLEY, ARE YOU
14 AWARE OF ANY OTHER RESTRAINING ORDERS THAT HAVE BEEN PLACED
15 ON MISS GALLIAN?

16 A SHE TOLD ME THAT HER EX-HUSBAND GEORGE PLACED
17 A RESTRAINING ORDER ON HER BASED UPON A PHYSICAL FIGHT WITH
18 -- BETWEEN JAMIE AND HIS WIFE.

19 Q AND MISS GALLIAN TOLD YOU THAT?

20 A YES.

21 MS. GRUENWALD: NO FURTHER QUESTIONS, YOUR HONOR.

22 THE COURT: ANYTHING, COUNSEL?

23 MR. BLANK: NOPE.

24 THE COURT: THANK YOU, MA'AM. YOU CAN STEP DOWN.

25 ALL RIGHT. MISS GRUENWALD.

26 MS. GRUENWALD: I JUST WANTED TO MAKE A VERY BRIEF

1 CLOSING STATEMENT, YOUR HONOR.

2 I KNOW THAT ONE OF THE DEFENSES THAT OPPOSING
3 COUNSEL HAS TRIED TO PUT FORTH IS THAT THERE'S NO ABUSE HERE
4 BECAUSE THERE'S NO SORT OF SUFFERING OR MENTAL HARM OR
5 ANYTHING LIKE THAT. BUT I BELIEVE THAT WE HAVE SHOWN MENTAL
6 SUFFERING.

7 AND ON TOP OF THAT, THE PURPOSE OF THE ELDER
8 ABUSE STATUTE IS TO AVOID HARASSMENT FOR MONEY. AND WE HAVE
9 A PATTERN HERE THAT WHEN MY CLIENT CUTS OFF MISS GALLIAN
10 THEN SHE ACTS UP.

11 AND I THINK THAT HER CONDUCT ALSO RISES TO
12 THE LEVEL OF EXTORTION. IN FLATLEY VERSUS MAURO, IT'S A
13 CALIFORNIA SUPREME COURT CASE, 39 CAL.4TH 299, EXTORTION IS
14 DEFINED AS OBTAINING PROPERTY FROM ANOTHER WITH HIS CONSENT
15 INDUCED BY A WRONGFUL USE OF FORCE OR FEAR. AND THAT CAN BE
16 THREATS IN WRITING AND THE PERSON NEED NOT ACTUALLY OBTAIN
17 THE PROPERTY.

18 IN THIS CASE MISS GALLIAN DID. MY CLIENT
19 GAVE HER THE PROPERTY JUST TO GET RID OF HER AND STOP THE
20 HARASSMENT. BUT THE PROPERTY DOESN'T NECESSARILY HAVE TO BE
21 TRANSFERRED FOR IT TO BE EXTORTION. AND I THINK IT RISES TO
22 THE LEVEL OF EXTORTION AND THAT WOULD CERTAINLY BE ELDER
23 ABUSE UNDER THE STATUTE.

24 AND IN THE FLATLEY CASE IT CAME UP IN THE
25 CONTEXT OF THE LITIGATION PRIVILEGE AND WHETHER THREATS
26 ABOUT LITIGATION WERE PROTECTED BY THE CONSTITUTIONAL RIGHT

1 OF FREE SPEECH AND THE COURT SAID, NO, THAT, ALTHOUGH YOU
2 CAN HAVE DISCUSSIONS BETWEEN PARTIES ABOUT LITIGATION, IT
3 CAN'T RISE TO THE LEVEL OF BEING THREATS AND DEMANDS FOR
4 MONEY WHICH IS WHAT WE HAVE HERE. AND I BELIEVE IT'S BEEN
5 SHOWED IN THE WRITTEN EMAILS, AS WELL AS THE VOICEMAILS,
6 EVEN -- AND THE TEXT MESSAGE. EVEN AFTER MY CLIENT
7 TRANSFERRED THE PROPERTY TO MISS GALLIAN SHE STILL CONTINUED
8 TO HARASS OR MAKE THREATS AND DEMAND SHE PAY THE LEASE, THE
9 TAXES, AND ET CETERA.

10 SO IN SHORT I BELIEVE WE MET OUR BURDEN AND
11 NOTABLY IN MISS GALLIAN'S VERIFIED RESPONSE SHE DID NOT DENY
12 ANY OF THE ALLEGATIONS. SHE CHECKED THE BOX THAT THEY WERE
13 JUSTIFIED. AND I DON'T BELIEVE THAT SHE HAS SHOWN THAT HER
14 ACTS ARE JUSTIFIED. SO WE WOULD REQUEST, RESPECTFULLY, THAT
15 THE COURT GRANT THE RESTRAINING ORDER.

16 THE COURT: COUNSEL?

17 MR. BLANK: YES, YOUR HONOR.

18 FIRST OF ALL, EXTORTION INVOLVES THE WRONGFUL
19 USE OF FORCE OR THREATS. THERE'S NOTHING EXTORTION ABOUT
20 SENDING SOMEONE AN EMAIL OR A LETTER OR ANYTHING ELSE WHERE
21 YOU SAY, "I THINK YOU DID THE FOLLOWING THINGS WRONG, AND
22 UNLESS YOU ADDRESS THIS I'M GOING TO SUE YOU." AND THAT'S
23 REALLY WHAT WE HAVE HERE. THAT IS PRIVILEGE. THAT IS
24 PETITIONING BEHAVIOR OR PRECURSING PETITIONING BEHAVIOR AND
25 OUR CONSTITUTION PROTECTS IT. SO I DON'T THINK WE'VE GOT A
26 CASE OF EXTORTION.

1 I THINK THE OTHER THING THAT IS IMPORTANT
2 THAT HAS COME OUT TODAY, AND IS VERY CLEAR, HAS TO DO WITH
3 THE FACT THAT IT IS STRESSFUL TO BE A LITIGANT. THERE'S NO
4 DOUBT ABOUT THAT. IT'S STRESSFUL TO HAVE TO ANSWER
5 QUESTIONS UNDER OATH TO SIT ON THE WITNESS STAND. IT'S
6 STRESSFUL TO BE SERVED WITH LAWSUITS. IT'S STRESSFUL TO
7 HAVE TO HIRE LAWYERS TO RESPOND TO THEM. ALL OF THAT IS
8 VERY STRESSFUL.

9 AND THERE'S NO DOUBT THAT MISS BRADLEY HAS
10 SUFFERED STRESS AS A RESULT OF ALL OF THOSE THINGS. BUT I
11 THINK THAT THE STRESS OR ANNOYANCE THAT SHE SUFFERED AS A
12 RESULT OF ALL THOSE THINGS IS NO DIFFERENT THAN WHAT SHE'S
13 ALLEGING SHE HAS SUFFERED AS A RESULT OF THE PRECURSORS, THE
14 EMAILS AND THE PHONE CALLS.

15 FOR EXAMPLE, MS. BRADLEY TESTIFIES THAT IT
16 WAS STRESSFUL TO HAVE TO SIT IN COURT AND SEE MISS BRADLEY
17 TODAY -- SORRY MISS GALLIAN TODAY. AND I DON'T DOUBT IT. I
18 DON'T DOUBT THAT'S STRESSFUL. BUT NEVERTHELESS THAT'S WHAT
19 HAPPENS WHEN YOU'RE IN A LAWSUIT. THAT'S WHAT HAPPENS WHEN
20 YOU ASKED FOR A TRO AGAINST SOMEONE. YOU GOT TO FOLLOW
21 THROUGH AND YOU'RE GOING TO BE FACE-TO-FACE WITH THE PERSON
22 WHO YOU'RE TRYING TO RESTRAIN.

23 AND SHE DOESN'T -- SHE'S NOT ENTITLED TO
24 A RESTRAINING ORDER SIMPLY BECAUSE SHE FINDS THAT STRESSFUL;
25 NOR IS SHE ENTITLED TO A RESTRAINING ORDER BECAUSE THERE'S A
26 PROBATE LITIGATION GOING ON; NOR IS SHE ENTITLED TO A

1 RESTRAINING ORDER BECAUSE THERE'S LITIGATION OVER THE HOA.
2 THOSE ARE THE THINGS THAT WE AS MEMBERS OF THE SOCIETY
3 ACCEPT AS PART OF OUR JUSTICE SYSTEM AND WE JUST HAVE TO
4 DEAL WITH IT.

5 SO THROUGHOUT THIS TESTIMONY I HAVEN'T SEEN
6 ANY EVIDENCE THAT SHE SUFFERED -- WHAT'S THE WORDS? I WANT
7 TO MAKE SURE I GET IT RIGHT -- THAT SHE HAS ENDURED MENTAL
8 SUFFERING AS A RESULT OF THE EMAILS OR THE CONTACT THAT
9 SHE'S TRYING TO PREVENT.

10 NOW BEYOND THAT, WE'VE HAD SEVERAL WEEKS
11 WITHOUT A RESTRAINING ORDER IN PLACE WITH NO PROBLEMS. WE
12 HAD SEVERAL WEEKS BEFORE THAT WHERE THERE WAS A RESTRAINING
13 ORDER IN PLACE. NO PROBLEMS. WE HAVE SOMEONE WHO IS HAVING
14 HER LIVELIHOOD THREATENED AS A RESULT OF THE POTENTIAL
15 IMPOSITION OF A RESTRAINING ORDER IN THIS CASE. AND I THINK
16 THAT WHEN THE COURT BALANCES EQUITIES AND MAKES ITS DECISION
17 IT SHOULD BE MINDFUL OF THE EFFECT THAT THAT'S GOING TO HAVE
18 ON MISS GALLIAN'S ABILITY TO EARN AN INCOME AND TO SUPPORT
19 HERSELF.

20 SO FOR ALL OF THESE REASONS I THINK THAT A
21 RESTRAINING ORDER IN THIS CASE -- A PERMANENT RESTRAINING
22 ORDER IS UNNECESSARY AND SHOULD NOT BE GRANTED.

23 THE COURT: SO YOU ARE WORKING CURRENTLY?

24 MR. BLANK: SHE'S ON A LEAVE OF ABSENCE.

25 THE COURT: YOU SAY YOU'RE NOT WORKING BECAUSE THERE
26 WAS A RESTRAINING ORDER AGAINST YOU AND THERE ISN'T AT THE

1 CURRENT TIME.

2 THE WITNESS: NO, NO, MA'AM. YOU HAD PUT A
3 RESTRAINING ON ME ON JUNE 13TH.

4 THE COURT: CORRECT. IT EXPIRED THREE WEEKS AFTER
5 THAT.

6 THE WITNESS: MY LEAVE OF ABSENCE HAD TO START JUNE
7 15TH.

8 THE COURT: I'M NOT FOLLOWING.

9 THE WITNESS: OKAY. YOU PUT A RESTRAINING ORDER --

10 THE COURT: YES, SO YOU TOOK A VOLUNTARY LEAVE OF
11 ABSENCE.

12 THE WITNESS: I CAN'T GO TO WORK WITH A RESTRAINING
13 ORDER.

14 THE COURT: THERE ISN'T A RESTRAINING ORDER AGAINST
15 YOU, MA'AM.

16 THE WITNESS: ON THE 13TH THERE WAS.

17 THE COURT: THERE WAS. SO ARE YOU CURRENTLY
18 WORKING?

19 THE WITNESS: NO.

20 THE COURT: WELL, SO THERE'S NO RESTRAINING ORDER
21 AGAINST YOU RIGHT NOW.

22 MR. BLANK: CAN I ASK A QUESTION, YOUR HONOR?

23 WHEN DOES YOUR LEAVE OF ABSENCE END?

24 THE WITNESS: UM, I WOULD LIKE TO GO BACK TO WORK
25 AUGUST 1ST.

26 MR. BLANK: SO IF THERE'S NO RESTRAINING ORDER

1 THAT'S IMPOSED AGAINST YOU HERE --

2 THE WITNESS: RIGHT.

3 MR. BLANK: -- YOU INTEND TO GO BACK TO WORK
4 STARTING AUGUST 1ST?

5 THE WITNESS: RIGHT.

6 THE COURT: IS THERE SOME REASON YOU HAVEN'T ALREADY
7 GONE BACK?

8 THE WITNESS: BECAUSE I'D HAVE TO TELL THEM THAT I
9 HAVE TO COME BACK HERE ON JULY 20TH. THEY DON'T WANT YOU TO
10 GO OUT, COME BACK, GO OUT AND COME BACK ANYMORE. IT'S -- I
11 HAVE THE LETTER HERE, MA'AM, THAT --

12 MS. GRUENWALD: YOUR HONOR, I DON'T BELIEVE IT'S A
13 DEFENSE. YOU DON'T GET TO HARASS PEOPLE --

14 THE COURT: I BELIEVE YOU MADE YOUR STATEMENT,
15 COUNSEL.

16 ALL RIGHT. THE ISSUANCE OF THE RESTRAINING
17 ORDER IS BASED ON A PREPONDERANCE OF THE EVIDENCE. YOU'VE
18 MADE A GREAT ATTEMPT HERE, COUNSEL, TO SHOW THAT, OH, THIS
19 IS ONLY ABOUT LITIGATION.

20 THE COURT DOESN'T SEE IT THAT WAY.
21 BECAUSE THE TESTIMONY WE HAVE IS THAT, AND IT WAS DISPUTED,
22 I HEARD NOT ONE WORD FROM THE RESPONDENT ABOUT IT, WAS IN
23 DECEMBER SHE LEFT A PHONE MESSAGE SHE WOULD SHOW UP WHEN
24 LEAST EXPECTED AT HOME OR AT HER WORK AND THEY WOULD HAVE IT
25 OUT. AND AT THAT POINT PETITIONER BECAME AFRAID OF HER
26 BECAUSE SHE DIDN'T KNOW WHAT SHE MEANT. I DIDN'T HEAR

1 ANYTHING ABOUT THAT AT ALL. THAT'S UNDISPUTED TESTIMONY AT
2 THIS POINT.

3 FURTHER, IN TALKING ABOUT IN SAYING THERE'S
4 THE DECEPTION, WHICH I ALSO HEARD NO DENIAL OF, OF THE EMAIL
5 THAT ALLEGEDLY WAS COMING FROM THE SON THAT WAS ACTUALLY
6 COMING FROM HER, I HEARD NO DENIAL OF THAT. I'M NOT SURE
7 WHY THERE WASN'T AN ATTEMPT TO MISDIRECT WHAT PETITIONER WAS
8 DOING AT THAT POINT IN TIME.

9 AND YOU SAY THAT SOME OF THESE EMAILS THEY
10 DON'T RISE TO THE LEVEL OF EXTORTION. THEY MIGHT NOT QUITE
11 RISE TO THAT LEVEL, BUT I HAVE SOME REAL PROBLEMS WITH THE
12 WAY THEY WERE PHRASED.

13 FOR INSTANCE, ON APRIL 10TH, THE EMAIL THAT
14 STARTS -- IT FINISHES, "I ALREADY STARTED GATHERING THE
15 EVIDENCE. EITHER WAY IT WILL TURN OUT BADLY. I JUST WONDER
16 IF YOUR HEALTH CAN WITHSTAND THE STRESS." THAT'S NOT A
17 COMMENT OUT OF CARING. THAT'S A COMMENT -- THE COURT TAKES
18 THAT AS A THREAT. "WE'LL KEEP GOING WITH LITIGATION. CAN
19 YOUR HEALTH STAND UP TO THIS." I DON'T SEE THAT AS
20 SOMEBODY THAT CARES AT ALL.

21 ON 13 WE'RE TALKING ABOUT THE EMAIL THAT WAS
22 SENT BY MISS TAGUE SAYING, "PLEASE STOP CONTACTING MY
23 CLIENT," AND YET AFTER THAT WE HAVE COMMUNICATION IN MAY.

24 AND IN THAT COMMUNICATION IN MAY THERE WERE
25 SEVERAL DIFFERENT INSTANCES OF IT. "STOP BEING SO
26 IRRATIONAL. YOU DID NEED MY HELP WITH THE HOA. AND YES,

1 YOUR HEALTH IS BEING TAXED FROM YOUR OWN STRESS AS YOU SELF
2 REPORTED TO ME." INTERESTING I NEVER HEARD TESTIMONY
3 REGARDING THAT EITHER. EXCEPT FOR A DENIAL BY THE
4 RESPONDENT THAT THAT HAD HAPPENED.

5 BUT IF WE GO BACK TO THESE PHONE MESSAGES
6 THAT WERE ACCEPTED, I SUPPOSE ONE OF THE THINGS THAT GIVES
7 THE COURT THE MOST PROBLEM IS THE THIRD VOICEMAIL
8 TRANSMISSION.

9 AND, COUNSEL, AGAIN YOU TRIED VERY HARD TO
10 SAY THAT, WELL, SHE SHOULD HAVE BEEN TOLD THAT THE COSTCO
11 CARD WAS BEING CANCELLED SO SHE COULDN'T USE IT. I HAVE NO
12 REASON TO THINK SHE SHOULD HAVE BEEN TOLD ANYTHING LIKE
13 THAT.

14 BUT THE TRANSCRIPT SAYS, "HEY, CINDERELLA."
15 WELL, RIGHT THERE IT'S INSULTING. I HAVE NO IDEA WHY SHE
16 WOULD SAY, "HEY, CINDERELLA." "FINE WITH ME. YOU DON'T
17 MIND" -- OKAY. "OH, MY GOD. ARE YOU KIDDING ME. REALLY.
18 HOW PETTY." AND THEN AT THE END, "YOU'RE SUCH A FUCKING
19 BITCH. I HOPE YOU CHOKE." NICE. THAT IS NOT SOMETHING
20 THAT'S DONE IN RESPONSE TO LITIGATION. "YOU'RE A FUCKING
21 BITCH. I HOPE YOU CHOKE." THAT'S A THREAT.

22 ALL RIGHT. AND WE ALSO HAVE, INTERESTINGLY,
23 AND I THINK THE COURT -- WELL, SPECIFICALLY POINTED OUT THAT
24 IN TALKING ABOUT, IN THE FIRST VOICEMAIL TRANSCRIPTION, IN
25 TALKING ABOUT THE ASSETS OF DAD THAT, "OH, HE WOULD HAVE
26 SHARED, HE WAS GENEROUS." WE THEN HAVE, "I'M NOT SAYING

1 YOU DON'T DESERVE THEM AS THE RIGHT. YOU ABSOLUTELY DO."
2 SEEMS TO INDICATE TO ME THAT THEY HAD NO RIGHT TO THESE
3 ASSETS.

4 BY THE WAY, THIS WAS DONE IN MAY AFTER SHE
5 ALLEGEDLY FOUND OUT THAT THERE WAS ALLEGEDLY A WILL SHREDDERED
6 AND THAT THE TRUST WAS NOT HER FATHER'S TRUST. SO WHY WOULD
7 SHE BE SAYING IN MAY YOU'RE ABSOLUTELY ENTITLED THIS STUFF
8 WHEN SHE ALREADY SUED HER EARLIER IN APRIL? DOESN'T MAKE
9 ANY SENSE.

10 SO WHEN YOU TALK ABOUT MENTAL DISTRESS THOUGH
11 THERE'S SOMETHING ELSE YOU HAVE TO REALIZE. AS PEOPLE GET
12 OLDER THEY ARE MUCH LESS ABLE TO WITHSTAND STRESS, WHICH IS
13 ONE REASON THAT WE HAVE ELDER ABUSE STATUTES, AND THAT WE DO
14 THEM BASED ON A PREPONDERANCE. BECAUSE THE OLDER WE GET THE
15 LESS ABLE WE ARE TO WITHSTAND MENTAL OR EMOTIONAL ABUSE. I
16 DON'T KNOW IF THERE'S BEEN FINANCIAL ABUSE HERE. IT APPEARS
17 TO THE COURT THAT WHAT WAS DONE WAS DONE VOLUNTARILY ON
18 SOMETHING THAT WILL GET WORKED OUT IN THIS PROBATE. BUT AS
19 FAR AS PREPONDERANCE OF THE EVIDENCE IT MEETS PREPONDERANCE
20 OF THE EVIDENCE.

21 THE COURT THEREFORE HAS TO FIND THAT THERE'S
22 BEEN ELDER ABUSE. IT'S BEEN PERPETRATED BY RESPONDENT AND
23 WAS NOT IN SELF-DEFENSE. I WILL ISSUE THE RESTRAINING
24 ORDER.

25 I ASSUME, COUNSEL, YOU WILL APPEAL, BUT AT
26 SOME POINT IN TIME, WHATEVER, IT WILL ISSUE TODAY.

1 MR. BLANK: OKAY.

2 THE COURT: ALL RIGHT. SO I WILL ASK THE PARTIES TO
3 PLEASE WAIT FOR THAT. IF YOU DON'T HAVE TIME -- I DON'T
4 KNOW IF, COUNSEL, IF YOU'RE ATTENDING THE SECTION MEETINGS
5 TODAY, YOU CAN ALWAYS COME BACK AND PICK IT UP THIS
6 AFTERNOON, IF YOU HAVE A CRUNCH FOR TIME RIGHT NOW.

7 MR. BLANK: I PREFER TO HAVE MY ATTORNEY SERVICE
8 COME BACK AND PICK IT UP IF THAT'S OKAY.

9 THE COURT: THAT'S FINE. BUT THEN YOU WILL MAKE
10 SURE YOU GIVE IT TO YOUR CLIENT.

11 MR. BLANK: MY CLIENT IS PRESENT IN COURT AND IS
12 AWARE THAT SHE'S BEING RESTRAINED.

13 IS THAT CORRECT?

14 THE COURT: IS THAT CORRECT?

15 THE WITNESS: ARE YOU REALLY SAYING I HAVE TO QUIT
16 MY JOB BECAUSE OF THIS?

17 THE COURT: MA'AM, I DIDN'T WRITE THE LAW BUT I WILL
18 ENFORCE IT.

19 THE CLERK: YOUR HONOR, EXHIBITS TO BE RETURNED?

20 THE COURT: EXHIBITS RETURNED.

21 THE CLERK: AND FOR THE CLERK'S VERIFICATION WE HAVE
22 EXHIBITS 3 THROUGH 14 RECEIVED ONLY?

23 THE COURT: CORRECT. OH, WAIT. DID WE RECEIVE 1?

24 MR. BLANK: IT'S THE PETITION. I THINK IT'S PART OF
25 THE COURT'S RECORD ANYWAY.

26 THE COURT: I THINK IT IS TOO.

1 MR. BLANK: AND SAME THING WITH 2 WHICH IS THE
2 RESPONSE.

3 THE COURT: RIGHT.

4 MR. BLANK: AND I HAVE NO PROBLEM WITH THE EXHIBITS
5 BEING RETURNED, BUT I'D LIKE A STIPULATION ON THE RECORD
6 THAT WE CAN -- IF THERE IS AN APPEAL THAT WE'LL CREATE OUR
7 OWN RECORD FROM THESE EXHIBITS.

8 MS. GRUENWALD: SO STIPULATED.

9 THE COURT: ALL RIGHT. WE'LL RETURN EXHIBITS.
10 THANK YOU.

11 MS. GRUENWALD: THANK YOU, YOUR HONOR.

12 THE COURT: AGAIN, MISS GRUENWALD, YOU CAN ALSO HAVE
13 YOUR SERVICE PICK IT UP THIS AFTERNOON.

14 MS. GRUENWALD: I'LL DO THAT. THANK YOU.

15 THE COURT: THANK YOU.

16 (END OF PROCEEDINGS.)

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REPORTER'S CERTIFICATE

STATE OF CALIFORNIA)
) SS.
COUNTY OF ORANGE)

I, LISA A. AUGUSTINE, RPR, CSR #10419, OFFICIAL
COURT REPORTER IN AND FOR THE SUPERIOR COURT OF THE STATE OF
CALIFORNIA, COUNTY OF ORANGE, DO HEREBY CERTIFY THAT THE
FOREGOING TRANSCRIPT IS A TRUE AND CORRECT TRANSCRIPT OF MY
SHORTHAND NOTES, AND IS A FULL, TRUE AND CORRECT STATEMENT
OF THE PROCEEDINGS HAD IN SAID CAUSE.

DATED: AUGUST 6, 2017.

Lisa Augustine

LISA A. AUGUSTINE, RPR, CSR #10419
OFFICIAL COURT REPORTER